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SUPERFUND DIV. REMEDIAL BRANCH (6SF-R)

July 28, 2015

via UPS#1Z7158171394236696

Mr. Kenneth Talton, Enforcement Officer Superfund Enforcement Assessment Section (6SF-TE) U.S. EPA, Region 6 1445 Ross Avenue Dallas, TX 75202-2733

> Re: CERCLA 104(e) Information Request SBA Shipyard Superfund Site, Jennings, Jefferson Davis Parish, Louisiana; CERCLIS #: LAD008434185; Information Request Pursuant to CERCLA Section 104(e), 42 U.S.C. §9604(e), Information Request

Dear Mr. Talton:

Martin Operating Partnership L.P. ("MOP"), herewith submits the following response pursuant to the aforementioned request on behalf of itself, as successor to Martin Gas Marine, and on behalf of L&L Oil and Gas Services LLC ("L&L") and Talen's Marine & Fuel, LLC ("Talens") (collectively, "Martin"). On December 31, 2013, MOP acquired the membership interest in Talen's. An affiliate of MOP purchased the membership interest in L&L, and L&L was subsequently merged into another affiliate on January 1, 2012.

GENERALINFORMATION CONCERNING RESPONDENT

1. Provide the full legal name and mailing address of the Respondent.

Martin Operating Partnership L.P. 4200 B Stone Road Kilgore, TX 75662

2. <u>Identify and provide the full name, title, business address, and business telephone number for each person answering these questions on behalf of the Respondent, and each person(s) that was relied on or consulted with in the preparation of the answer.</u>

See Appendix A

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3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, and telephone number.

Chris Booth General Counsel 4200 B Stone Road Kilgore, TX 75662 (903) 983-6443

4. <u>If Respondent is a business, please give a brief description of the nature of the business.</u>

Respondent is, among other things and as pertains to this response, involved in the distribution of fuel and lubricants and marine transportation.

REQUESTS FOR DOCUMENTS.

1. Please identify any dealings or transactions you have or had with SBA Shipyards, Inc., Louis Smailhall, Suzanne Smailhall, LEEVAC Shipyards, Inc., n/k/a Bunge Street Properties, LLC, and LEEVAC Industries, LLC n/k/a LEEVAC Shipyards Jennings, LLC. Please provide a brief description of the nature of those dealings or transactions and the timeframes during which those dealings and transactions occurred.

Respondent objects that this Request is not a proper "Request of Documents." Instead it is an information request, not seeking documents. Moreover, it is vague, particularly as to the terms "dealings or transactions."

Respondent also claims attorney-client, attorney work product, and joint defense privileges over certain discussions and documents exchanged between and among (i) other alleged customers of SBA Shipyards, Inc. and counsel, and (ii) certain discussions and documents exchanged between and among Members of SSIC Remediation, LLC and counsel.

Subject to and without waiving the objections, Respondent states:

• Martin Gas Marine, Inc., L&L Oil and Gas Services, LLC, and Talen's Marine and Fuel, Inc. were contacted by and interacted with attorneys for SBA Shipyards, Inc. and/or Louis Smailhall beginning in 1996. At that time, SBA's attorneys were seeking monetary contributions from alleged barge cleaning customers of SBA Shipyards. Inc. towards site cleanup work at the SBA Shipyards. Inc. facility Near Jennings, LA. Martin Gas Marine, Inc., L&L Oil and Gas Services, LLC, and Talen's Marine and Fuel, Inc. each corresponded with and/or met with attorneys for SBA Shipyards, Inc. and/or Louis Smailhall. They also participated in

confidential discussions with certain other companies also allegedly identified as customers by attorneys for SBA Shipyards, Inc. and/or Louis Smailhall, and ultimately became Members of SSIC Remediation, LLC., a company set up to negotiate with SBA Shipyards, Inc., Louis Smailhall, Suzanne Cornelius, EPA and LDEQ, and to perform a cleanup at the SBA Shipyards, Inc. facility pursuant to a December 2002 Agreement with EPA. That work was deemed successfully completed by EPA in 2006. SSIC Remediation, LLC dissolved in 2009. Since the formation of SSIC Remediation, LLC, Respondent has had no other dealings or transactions with SBA Shipyards, Inc., Louis Smailhall, Suzanne Cornelius.

- It has no records of any dealings or transaction with SBA Shipyards, Inc. and/or Louis Smailhall other than it has located documents presented to Talen's by attorneys for SBA Shipyards, Inc. and/or Louis Smailhall in the late 1990s that purport to identify dealings and transactions with SBA Shipyards, Inc. Those documents are produced. See Appendix B.
- It has also located and produces documents in its possession that may reflect dealings or transactions between L&L Oil and Gas Services, LLC and Leevac Industries, LLC (not <u>LEEVAC Shipyards Jennings, LLC, or</u> Leevac Shipyards, Inc.) between 2003 and 2008. See Appendix C.
- a. Specifically, provide dates of when you sent or moved something to the Site and the name and contact information of the person who made such arrangements.

Subject to the same objections and privileges as noted above, Respondent has located no records indicating that that any of the entities for whom it is responding here sent or moved something to the Site. See also response to Request 1, above.

2. <u>Please provide any and all documents that are related to the dealings and transactions detailed in Question 1 above.</u>

Subject to the same objections and privileges as noted above in response to Request 1, see response to Request 1, above.

3. If any of the dealings or transactions described involve hazardous materials, please include a detailed listing of such materials, the materials data safety sheet, dates of transaction, and any quantity associated with those materials.

Subject to the same objections and privileges as noted above in response to Request 1, see response to Request 1, above.

4. Please describe in detail any involvement you had with the 2002 RCRA Interim Measures/Removal Action (IM/RA) at the Site. Please provide any and all

documents in your possession related to the IM/RA, including, but not limited to, a listing of the parties involved in the IM/RA.

Subject to the same objections and privileges as noted above in response to Request 1, Respondent states that it was Member of SSIC Remediation, LLC, which performed the IM/RA pursuant to an agreement with EPA. See also response to Request 1, above. Moreover, Respondent understands that documents "related to the IM/RA, including, but not limited to, a listing of the parties involved in the IM/RA" were previously supplied to EPA by SSIC and are in the possession of EPA.

5. Please provide the names, titles, and contact information of anyone, including, but not limited to, employees, who may possess knowledge and information regarding this Site and/or your own business operations.

Respondent objects that this Request is vague, overly broad and compound. Clearly representatives of EPA and the Louisiana Department of Environmental Quality (LDEQ) have had extensive dealings with the owners and operators of the Site and extensive knowledge of the conditions of the Site for decades. Subject to these objections and the same objections and privileges as noted above in response to Request 1, see response to Request 1, above. See also Appendix A. There are no current employees of Respondent that have any direct knowledge of any activities at the Site outside of those involved in the formation of SSIC, LLC.

- 6. <u>Identify all of the individuals who currently have and those who have had responsibility for the Respondent's environmental matters (e.g., responsibility for the disposal, treatment, storage, recycling, or sale of the Respondent's wastes).</u>
 This information shall include, but not limited to, the following:
 - a. Each individual's job title and duties (including the dates performing those duties),
 - b. The supervisors for such duties,
 - c. The current position or the date of the individual's resignation, and
 - d. The nature of the information possessed by such individuals concerning Respondent's waste management.
 - e. The contact information of the individual.

Respondent objects to this Request as it is seeks information or documents that are not within the scope of EPA's authority under CERCLA Section 104 (e)(2). This Request seeks no information or documents relating to any release or threatened release of a hazardous substance, pollutant or contaminant from the Site, as defined by EPA.

Subject to, but without waiving, these objections, and subject to the same objections and privileges as noted above in response to Request 1, Respondent offers that:

Respondent has had many responsible individuals for environmental matters over the long history of the company. From 2012 and forward, the following individuals have responsibilities for environmental matters:

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Currently Responsible

John "Pete" Howard Director Corporate EH&S 10100 Woolworth Rd Keithville, LA 71047

Randall Whitmore Director Corporate Environmental 10100 Woolworth Rd Keithville, LA 71047

Past Responsibility

Roy Dowling (2012 - February 2015) VP EHS 10100 Woolworth Rd Keithville, LA 71047

7. Does the Respondent's company or business have a permit(s) issued under RCRA? If so, provide a copy (ies) of the permit(s).

Subject to the same objections as noted above in response to Request 6, Respondent offers that it does not have any RCRA permits.

8. <u>Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.</u>

See objections and response to Request 10, below.

9. Does the Respondent's company or business have, or has it ever had, a permit(s) under the hazardous waste laws of the State? If so, provide a copy (ies) of the permit(s).

Subject to the same objections as noted above in response to Request 6, Respondent offers that it does not have any such permits.

10. Does the Respondent's company or business have an EPA Identification Number, or an identification number supplied by the State? If so, supply any such identification number(s).

Subject to the same objections as noted above in response to Request 6, Respondent offers the following information:

ALR000028084	LAD982757510	LAR000034561	TXD000719153
ALR000037069	LAD985171826	LAR000034579	TXD010806347
ARD084935089	LAD985171842	LAR000057810	TXD043155134
ARD990869737	LAD985171859	LAR000067140	TXD058266271
IL0994055033	LAD985171875	LAR000067165	TXD067940957
KS0000618132	LAD985171883	LAR000074716	TXD980699094
LAD097560437	LAD985189497	LAR000078659	TXD981518871
LAD098197106	LAR000005652	MSD982095770	TXR000006825
LAD118102870	LAR000007948	NED035134154	TXR000042911
LAD980621429	LAR000034454	TXD000642538	UTD980635338
LAD982757502	LAR000034462		

11. <u>Identify all federal, state, and local offices and agencies to which the Respondent has sent or filed hazardous substance or hazardous waste information and state the years during which such information was sent or filed.</u>

Subject to the same objections as noted above in response to Request 6, Respondent offers the following information:

Respondent has operated for many years in different states. Respondent has submitted various reports dealing with Hazardous Substances and/or Hazardous Waste such as SARA Title III Section 313, Form R Reports and Hazardous Waste Reports. Respondent has submitted reports for many years as required by Federal and State regulations to the following:

U.S. EPA, Region 6
US EPA, Region 4
Texas Commission on Environmental Quality
Louisiana Department of Environmental Quality
Alabama Department of Environmental Management
Mississippi Department of Environmental Quality

12. Provide copies of all documents created or kept by the Respondent related to the nature, quantity, or source of the materials taken to the Site.

Subject to the same objections and privileges as noted above in response to Request 1, see responses to Requests 1 and 1a, above. Additionally, Respondent states it has no information of taking materials to the Site.

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- 13. If barges were placed or disposed at the Site, please provide the following information:
 - a. Where they were placed or disposed, and
 - b. Their condition when placed or disposed.

Respondent did not place or dispose of any barges at the Site.

14. <u>Identify other individuals and entities that the Respondent has reason to believe may have taken or sent materials to the Site.</u> Of these individuals and entities, specify which were observed by the Respondent at the Site and indicate when those observations were made. Provide all of the information known by the Respondent regarding the customers of these entities or individuals.

Subject to the same objections and privileges as noted above in response to Request 1, Respondent states that Respondent has no information or documents responsive of this Request other than it has in its possession documents prepared by attorneys for SBA Shipyards, Inc. and/or Louis Smailhall and provided by them in or about 1996. See also responses to Requests 1, above.

Sincerely,

John Ben Blackburn

Assistant General Counsel

Enclosures

cc:

Pete Howard, Martin

Mike Chernekoff, JONES WALKER

Appendix A

John "Pete" Howard Director Corporate EH&S 10100 Woolworth Rd Keithville, LA 71047

Chris Booth Chief Legal Counsel 4200 B Stone Road Kilgore, TX 75662

John Ben Blackburn General Counsel 4200 B Stone Road Kilgore, TX 75662

Damon King Senior VP Martin Energy Services Martin Energy Services LLC Three Riverway, Suite 400 Houston, TX 77056

John Coutrado Accounting Manager MES Two Lakeway Center 3850 N. Causeway Blvd., Ste. 1330 Metairie, LA 70002

Richard Freed VP Martin Marine 2904 N. 23rd St. La Porte, TX 77571

Michael Chernekoff Jones Walker 1001 Fannin Street, Suite 2450 Houston, TX 77002

Appendix B



John Schwab Gerald L. Walter, Jr.

William E. Hodgkins Anne Jordan Crochet John F. Derenbecker J. Lee Alcock, Jr. Brent B. Boxill 10636 Linkwood Court Baton Rouge, Louisiana 70810-2854 Telephone (504) 767-1460 Fax (504) 769-0010

March 8, 1996

<u>CERTIFIED MAIL -</u> <u>RETURN RECEIPT REQUESTED</u>

Tallen Marine P.O. Box 1040 Lake Arthur, LA 70549

ATTN: Duke Gremillion

RE: Request for Voluntary Contribution to Fund Remediation and Closure

Activities at SBA Shipyards

Dear Mr. Gremillion:

The undersigned has been retained to assist SBA Shipyards, Inc. ("SBA") in addressing certain pending and proposed enforcement actions and interfacing with a remediation and compliance project team for the timely remediation and closure of certain waste management units at SBA. As you are aware, SBA has cleaned residues from Tallen Marine's barges in the past. A summary of those cleanings is attached for your review. Historically, SBA deposited these barge cleaning residues in unlined surface impoundments and recovered the hydrocarbons from the impoundments for off-site use as supplemental fuel or crude oil feedstock at oil refineries. Although the management of hydrocarbons during recent years has primarily been conducted in tanks, substantial hydrocarbon residuals remain in the surface impoundments. Moreover, it is believed by SBA (and will be confirmed in the next 30 to 60 days) that a free-phase hydrocarbon layer is present in the subsurface stratum between the bottom of the surface impoundments and the upper surface of the water table.

In light of enforcement actions issued by the Louisiana Department of Environmental Quality and an anticipated enforcement action from EPA Region VI, SBA is currently taking steps to develop the data necessary for the preparation and implementation of a remediation and closure program for the hydrocarbon management area of the facility. SBA also has the added incentive that, unless reasonable, consistent progress is made toward ultimate remediation and closure, EPA Region VI will likely take control of the remediation and closure activities. The resultant cleanup costs and litigation that would be initiated by EPA against SBA and its former and current

Tallen Marine March 8, 1996 Page 2

customers for cost recovery would result in final costs between three and four times the cost of a voluntary remediation and closure effort.

Unfortunately, it is impossible for SBA to fund the activities that must be conducted to remediate and close this portion of the facility within a time frame that will be acceptable to the regulatory agencies. Thus, SBA now finds itself in the awkward position of seeking outside resources to enable it to maintain satisfactory progress.

SBA's purpose for contacting you regarding this activity is to enlist Tallen Marine's voluntary participation in the funding of the remediation and closure efforts at the facility. Obviously, Tallen Marine has some potential liability at SBA since residuals from the cleaning of its barges are now present in the surface impoundments and groundwater. In an attempt to avoid delays in remediation activities and inevitable EPA intervention, SBA is approaching all of its former and current customers regarding voluntary contribution.

Please contact Mike DiGiglia of our office regarding Tallen Marine's interest in participating in the funding of the remediation and closure activities at SBA. We will be scheduling a meeting with representatives of SBA and SBA's former and current customers to provide more detailed information regarding the nature of the hydrocarbons involved, the probable scope of remediation and closure activities and the current level of progress that has been made to date.

If you should have any questions regarding this request, please contact the undersigned or Mike DiGiglia at (504) 767-1460.

Very truly yours,

SCHWAB & WALTER

Gerald R. Walker, G. Gerald L. Walter, Jr.

GLWjr/mr Enclosure

c: Mr. Louis Smaihall

Mr. Larry LeJeune

EPA - Greg Pasheic

PROBABLE SOURCES O	SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS							
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES					
Tallen Marine	8/29/90	T-13	Diesel (3x)					
,	9/19/90	Glenn C	Diesel (3x)					
	6/19/91	T-13	Diesel Fuel (3x)					
	6/26/92	T-13	Diesel					
	9/30/92	Rig Runner	Diesel, Water					
	8/3/93	Rig Runner	Diesel, Water					
	9/23/93	T-13	Diesel Fuel (3x)					
	10/31/94	T-13	Diesel (3x)					
	6/9/95	Glenn C	Diesel Fuel (3x)					

^{* -} Based on date from Marine Chemist's Gas Free Certificate

Schwab & Walter
Attorneys at Law
10636 Linkwood Court
Slaton Rouge, LA 70810-2854

CERTIFIED

Z 030 807 642

MAIL

RETURN RECEIPT REQUESTED



TALLEN MARINE PO BOX 1040 LAKE ARTHUR LA 70549

ATTN: DUKE GREMILLION

Haddlandalalalahatdd

Schwab & Walter Attorneys at Law

John Schwab Gerald L. Walter, Jr.

William E. Hodgkins Anne Jordan Crochet John F. Derenbecker J. Lee Alcock, Jr. Brent B. Boxill 10636 Linkwood Court Baton Rouge, Louisiana 70810-2854 Telephone (504) 767-1460 Fax (504) 769-0010

March 22, 1996

Duke Gremillion
Tallen Marine
P.O. Box 1040
Lake Arthur, LA 70549

RE: Follow Up to Request for Voluntary Funding - SBA Shipyards, Inc.

Dear Mr. Gremillion:

In response to requests from some of SBA Shipyard, Inc.'s ("SBA") current and former customers, please find enclosed the following information that will be of assistance in evaluating your company's potential liability at SBA.

- ♦ Customer Information Related to Historical Barge Cleaning Activities
- ♦ History of La. DEQ and U.S. EPA Enforcement Actions and Related Correspondence
- ♦ History of and Current Conditions at SBA Shipyards, Inc. And a Description of Known Environmental Impacts
- ♦ Summary of Conventional Analytical Results at SBA
- ♦ Summary of TCLP & RCI Analytical Results at SBA
- ♦ Figure 9 Horizontal Extent of Contamination Plume

As soon as we are able to make verbal contact with all 22 of the current and former customers of SBA regarding this matter, we feel a meeting among the parties would be in order. Accordingly, we will initiate the scheduling of a meeting in the near future.

If you should have any questions in the interim, please do not hesitate to contact the undersigned, or Mike DiGiglia of our office, at your convenience.

Sincerely,

SCHWAB & WALTER

Villiam F Hoddkins



SBA SHIPYARDS, INC.



CUSTOMER INFORMATION RELATING TO HISTORICAL BARGE CLEANING ACTIVITIES

BARGE COMPANY/OWNER	DATE RANGE	NUMBER OF VESSELS CLEANED	PREVIOUS CARGOES
National Marine Service P.O. Box 52189 New Orleans, LA 70512 Contact: Mark East Phone: (504) 529-8663 ATTORNEY: Michael A. Chernekoff Jones, Walker 201 St. Charles Ave. New Orleans, LA 70170 (504) 582-8000	8/77 - 3/94	72	Asphalt, Creosote, p-Xylene, Styrene, Vinyl acetate, carbon tetrachloride, methanol, coal tar, gasoline, creosote-type black oil, carbon black, ethyl acrylate, acrylates, heavy slop oil, com oil, diesel oil, black liquor, No. 6 oil, crude oil, coal tar distillate
Sabine Towing Company P. O. Box 1528 Groves, TX 77619 Contact: Dennis Buffo Phone: (409) 962-0201	3/82 - 10/88 、	5	Crude Oil, Jet Fuel, No. 6 Fuel, Condensate
Conoco Pipeline One Lakeshore Drive Calcasieu Marine Building, Ste. 900 Lake Charles, LA 70629 Contact: John Hartman Phone: (318) 583-3361	4/93 - 5/93	2	Gas Fuel-Diesel, Sour Gas-Oil
Morania Oil Tanker Corp. 1435 Richmond Terrace Staton Island, NY 10310 Contact: Bill Oppenhiemer Phone: (718) 442-0700 ATTORNEY: James M. Kenny	7/87 - 3/91	5	Asphalt, Gasoline, Asphalt, MTBE
Kenny & Stearns 26 Broadway New York, NY 10004-1882 (212) 422-6111			
Coastal Barge Company 8700 W. Flagler Miami, FL 33174 Contact: Albert Espino Phone: (305) 551-5380	5/89 - 10/89	2	Coal Tar, Cylinder Oil
Ashland Oil Company P. O. Box 391 Ashland, KY 41114 Contact: Rob Bradford Phone: (606) 329-4707	1/87 - 1/95	15	Crude Oil, Coal Tar, Cumene, Lube Oil, Asphalt Slops, Coke Oven Tar, Black Oil, Asphalt, No. 6 Asphalt, Recycled Crude, Vacuum Tower Bottoms, Charge Stock

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BARGE COMPANY/OWNER	DATE RANGE	NUMBER OF VESSELS CLEANED	PREVIOUS CARGOES
L & L Oil Company P. O. Box 6984 Metairie, LA 70009 Contact: Richard Childers Jerry Blake Phone: (504) 832-8600; 366-4960	10/94	1	[,] Diesel
Martin Gas Marine 8582 Katy Freeway, #112 Houston, TX 77024 Contact: Scott Martin Phone: (713) 461-0606	12/91	1	Gas, Oil
Sun Oil Company. 1801 Market Street Philadelphia, PA 19103 Contact: Thomas Haines, Esq. Phone: (215) 977-6273	1/89	1	Asphalt, Crude

TOTAL NO. OF BARGES 191

BARGE COMPANY/OWNER	DATE RANGE	NUMBER OF VESSELS CLEANED	PREVIOUS CARGOES
Ingram Barge Lines P. O. Box 23049 Nashville, TN 37020 Contact: Jim Anderson Bill Morelli Phone: (615) 298-8200/8244	1/87 - 11/93	7	Crude, No. 6 Oil, Coal Tar, Slop #6 Oll, Creosote, Heavy Aromatics/Gasoline, Crude Oil
Allied Towing P. O. Box 717 Norfolk, VA 23501 Contact: Kirk Woodruff Phone: (804) 545-7301	8/85 - 8/86	3	Asphalt, Bunker C, Caustic Soda
Transerve Marine P. O. Box 717 Norfolk, VA 23501 Contact: Kirk Woodruff Phone: (804) 545-7301	11/84 - 4/90	19	Caustic Soda, Tallow, Lube Oil, Com Oil, UREA-Ammonium Nitrate, Soybean
Higman Towing Company P. O. Box 908 Orange, TX 77631 Contact: Ginger Norwood Phone: (409) 883-5636	2/90 - 3/95	8	Crude Oil, No. 6 Oil, Kerosene
Tallen Marine P. O. Box 1040 Lake Arthur, LA 70549 Contact: Duke Gremillion Phone: (318) 774-5480	8/90 - 6/95	9	Diesel, Water
Hollywood Marine P. O. Box 1343 Houston, TX 77251 Contact: Mary Jones Phone: (713):868-1661	10/87 - 6/90	4	Crude Oil, No. 6 Oil, Bunker Oil, Black Oil
Marine Operators P. O. Box 51694 Lafayette, LA 70505 Contact: Stephen Orttie Rhone: (318) 232-9248	11/85	1	Diesel Oil
Sargent Marine 3111 University Drive, Suite 1000 Coral Springs, FL 33065 Contact: Dan Finocchi Phone: (954) 753-6501	3/95	1 .	Asphalt
Cenac Towing Company P. O. Box 2617 Hourna, LA 70361 Contact: Benny Cenac, Jr. Phone: (504) 872-2413	11/88 - 5/95	25	No. 6 Oil, Crude Oil, Condensate, Slop Oil, Asphalt, Lube Oil, Waste Water, Drill Water, Crude Distillate, Carbon Oil
Leevac Marine P. O. Box 2528 Morgan City, LA 70381 Contact: Dennis Taylor Phone: (504) 385-4853; 384-8000	12/84 - 7/88	10	Black Oil, Crude Oil, No. 6 Oil, Gasoline, Diesel

LA. DEPARTMENT OF ENVIRONMENTAL QUALITY AND U.S. EPA ENFORCEMENT ACTIONS AND RELATED CORRESPONDENCE

- 1. DEQ Order to Close (OC-0159) 8/27/90
- 2. DEQ Solid Waste Division Compliance Order (SE-C-92-0223) 12/2/92 (cover letter only; we could not find our copy of the order in time to enclose herewith)
- 3. DEO Hazardous Waste Division Compliance Order (HE-C-92-0503) 1/29/93
- 4. DEQ Hazardous Waste Division Penalty Notice (HE-P-92-0559) 1/29/93
- 5. DEQ Order of Consolidation 3/16/93
- 6. DEQ Administrative Order [Cease and Desist] 8/18/93
- 7. DEQ referral of matter to EPA 7/12/94
- 8. EPA's notice to DEQ that it plans to take direct enforcement action against SBA 11/4/94
- 9. DEQ order to stay proceedings pending further notice from EPA

HISTORY OF AND CURRENT CONDITIONS AT SBA SHIPYARDS, INC. AND A DESCRIPTION OF KNOWN ENVIRONMENTAL IMPACTS

1.0 DESCRIPTION OF OPERATIONS

1.1 Introduction and Background

Currently, the SBA Shipyards, Inc. facility ("SBA") is comprised of a 30-acre barge maintenance operation located at the end of State Highway 3166, approximately six miles southeast of Jennings, Louisiana. The land area is owned by Mr. Louis Smaihall, his daughter and son-in-law. SBA operated both the barge maintenance and gas freeing facility and the adjacent barge construction and repair operation at this location, a combined total of 680 acres, from 1967 to 1993. As of 1993, Lee Vac, Inc. has leased the adjacent 38 acre barge construction and repair operation and continues to do so today.

Historically, "heels" of various petroleum products, as well as sludges and wash waters containing residues of those products, were removed from the barges. The previous cargoes from which the sludges and wash waters were derived consisted primarily of crude oil, #6 fuel oil, #2 fuel oil, lubricating oil, coal tar and asphalt. The sludges and wash waters removed from the barges were historically stored in a system of four unlined, earthen surface impoundments. More recently, some of the wastewaters and sludges were stored in above-ground, on-ground or in-ground tanks, most of which, were converted barges.

The surface impoundments and most of the tanks on-site are the subject of anticipated closure activities as discussed below.

1.2 Description of Recent Operations

SBA currently operates a barge slip and dock for cleaning and gas freeing barges. The various activities conducted in the recent past at SBA are described below.

1.2.1 Removal of Residuals from Barges

The first step in cleaning and gas freeing barges was to remove the gross residuals from the entire barge or just those compartments scheduled for maintenance. Originally, all residuals along with any wash water were pumped from the barges to the surface impoundments. More recently, the pumpable materials were pumped to one of three converted barge tanks, WT-1 WT-2 or WT-3, where the solids, water and oils were allowed to phase separate. Non-pumpable materials were removed from the barges using manual labor and temporarily stored onsite in waste piles or in the surface impoundments. The remaining residues were removed using a

"butterworth" apparatus which consisted of a high pressure wash using diesel, water and a surfactant.

1.2.2 Steam Injection

For heavy accumulations of sludges in the barges, high pressure water and steam were used to "cut" the sludges or "cakes" present in the barges. The sludges were then removed using manual labor and cranes to waste piles or the surface impoundments. The wastewater that was produced by the steam/water injection process was originally pumped to the surface impoundments. More recently, these materials were pumped to one of the three converted barge tanks (WT-1, WT-2 or WT-3) as described in Section 1.2.1. The source of the high pressure water is water that has been processed through the waste water separator and reused as wash water.

1.2.3 Water/Hydrocarbon Storage Pending Treatment or Disposal

Water, hydrocarbon and water/hydrocarbon emulsions generated by the sludge and residue removal process are stored on-site in a variety of tanks and converted barges. A list of the tanks and certain information related to their capacity and planned future use is provided in Table 1-1. A large quantity of water/hydrocarbon emulsions is also stored in one of the surface impoundments, the Oil Pit. Wastewater is also stored in two of the surface impoundments, the Oil Pit and Pit No. 2. All of these surface impoundments are scheduled for closure.

1.2.4 Sludge Management and Storage

Sludges containing hydrocarbons were removed from barges by two means. First, sludges are suspended in water during the high pressure water/steam process used to loosen the sludges were allowed to settle out in one of the three barge tanks. Second, as noted above, sludges were physically removed and, until recently, stored on-site in waste piles or in the surface impoundments.

Sludges containing hydrocarbons generated during previous methods of operation were also stored in two surface impoundments (Oil Pit and Pit No. 2). Two other pits are present on-site. Pit No. 1 contains sludges that have been "stabilized" but was not treated pursuant to an approved closure plan. Some additional treatment or handling may be required. Pit No. 3 is a very large pit which received primarily water overflow from Pit No. 2 but only minute quantities of solids. It is believed that Pit No. 3 is not regulated under RCRA and, thus, may be subject to closure under the solid waste regulations. Some of the treated sludges from Pit No. 1 have been spread on the ground in one area of the facility which is considered a land treatment unit by U.S. EPA.



	TABLE 1-1 CURRENT TANKS AT SBA							
TANK NO.	CAPACITY (Gal)	ТҮРЕ	CONTENTS	PLANNED FUTURE USE				
FT-1	4,567	AST/CT	Diesel Fuel	Diesel Storage				
FT-2	3,171	AST/CT	Diesel Fuel	Diesel Storage				
FT-3	264	AST/CT	Gasoline	Gasoline Storage				
FT-4	12,148	IST/CT (Converted Barge)	Diesel Fuel	Closure				
FT-5	12,148	IST/CT (Converted Barge)	Diesel Fuel	Closure				
FT-6	12,148	IST/CT (Converted Barge)	Diesel Fuel	Closure				
WT-1	141,382	OST/OT (Converted Barge)	Wastewater & Sludge	Closure				
WT-2	141,382	OST/OT (Converted Barge)	Wastewater & Sludge	Closure				
WT-3	141,382	OST/OT (Converted Barge)	Wastewater & Sludge	Closure				
WT-4	494,079	OST/CT	Wastewater	Wastewater Storage				
WT-5	47,875	OST/OT	Wastewater/Boiler Feed Water	Wastewater/Boiler Feed Water Stg				
WT-6 (formerly OT-1)	8,187	AST/CT	Emulsion	Closure				
WT-7 (formerly AT-1)	17 <u>,</u> 617	AST/CT	Emulsion	Closure				
WT-8 (formerly AT-2)	17,617	AST/CT	Emulsion	Closure				
0Т-2	8,187	AST/CT	Emulsion	Closure				
0Т-3	7,105	AST/CT	Emulsion	Closure				
OT-4	991,169	IST/CT (Converted Barge)	Emulsion	Closüre				
AT-3	7,105	AST/CT	Asphalt/Tar/Sludge	Closure				
ST-1	336,623	OST/CT	Emulsion	Closure				
OT-4 AT-3 ST-1	991,169 7,105 336,623	IST/CT (Converted Barge) AST/CT OST/CT	Emulsion Asphalt/Tar/Sludge	Clo Clo				

2.0 DESCRIPTION OF ANTICIPATED CLOSURE ACTIVITIES

2.1 Surface Impoundment Closures

The closure activities will involve the removal of water, oils, emulsions, sludges, and solids from three surface impoundments. The water will either be treated and discharged or sent off-site for disposal. Analyses of the sludges have resulted in the determination that the material in the Oil Pit and Pit No. 2 is a RCRA hazardous waste. The sludges in the surface impoundments will likely be stabilized using on-site excavators and/or other mixing equipment and closed in place. The treated material in Pit No. 1 will also have to be addressed. A treatability study and closure cost estimate is currently under development for the Oil Pit, Pit No. 1 and Pit No. 2. Once the results of this study are available, a closure plan needs to be prepared as soon as possible and submitted to U.S. EPA Region VI and the DEQ Solid Waste and Hazardous Waste Divisions for approval.

2.2 Land Treatment Unit

The closure activities will involve either on-site treatment and disposal within one of the surface impoundments to be closed or off-site treatment and disposal at a permitted facility.

2.3 Removal of Stored Hydrocarbons, Emulsions, and Sludges

The hydrocarbons, emulsions, and sludges currently stored in tanks may be separated on-site for hydrocarbon recovery or treated and disposed of at an off-site permitted disposal facility. Several recovery and on-site oil/separation service companies have expressed an interest in evaluating these materials.

2.4 Groundwater Monitoring and Remediation

It is believed that there is a free-phase layer of hydrocarbons floating on the water table in the vacinity of the surface impoundments (see attached drawing). The current thickness of this layer, its horizontal extent, rate of movement and its chemical composition remains to be determined. The development of a groundwater investigation and remedial action plan needs to be initiated as soon as possible. It is believed that a significant groundwater pump and treat program will have to be implemented.

2.5 Closure Cost Estimates

An estimate of costs will not be available until the treatability study and closure cost estimate has been completed. As soon as reasonably reliable cost estimates are available, copies will be forwarded to the group.

SBA SHIPYARDS, INC. SUMMARY OF CONVENTIONAL ANALYTICAL RESULTS AT SBA FROM 10/25/95 SAMPLING EVENT

VESSEL NO.⇒ JANALYTE	OP-A	OP-B	OP-C	WT-1	WT-2	WT-3	WT-6 (AT-1)	WT-7 (AT-2)	WT-8 (OT-1)	AT-3	ОТ-2	ОТ-3	0T-4	ST-1
Ash Content (wt%)	3.3	2.4	5.8	2.5	5.2	3.6	4.4	3.8	2.15	**	0.9	2.6	2.3	2.5
Sediment & Water (vol%)	NR	52.0	80.0	52.0	80.0	72.0	60.0	80.0	60.0	. ••	52.0	40.0	80.0	52.0
Density @ 60°F	1.188	1.0379	1.0651	1.0498	1.1933	1.0511	1.1133	1.1170	1.091	44	1.0388	1.0914	1.041	1.1603
Sulphur Content (wt%)	0.22	0.62	0.38	0.84	0.77	0.85	0.83	0.83	0.76	++	0.34	0.92	0.91	0.78
Water Content by Distillation (vol%)	59.0	32.0	22,0	58.0	81.0	40.0	36.0	31.0	59.0	44	60.0	28.0	80.0	39.0
Total Arsenic (mg/kg)	ND	1.9	1.4	ND	ND	ND	ND	0.6	· ND	**	ND	ND	0.4	ND
Total Barium (mg/kg)	255.0	128.0	2.49	210.0	196.0	193.0	166.0	174.0	244.0	**	78.3	132.0	200.0	61.2
Total Mercury (mg/kg)	7.0	ND	ND	. ND	ND	ND	ND	ND	ND	**	ND	ND	ND	ND
Total Lead (mg/kg)	63.2	21.9	44.5	16.0	19.1	18.1	26.5	23.7	16.8	**	7.4	16.2	20.0	24.2
Total Selenium (mg/kg)	מא	ND	ND.	ND	ND	ND	ND	ND	ND	**	ND	ND	ND	ND
Total Silver (mg/kg)	ND	ND	ND	ND	ND	2.3	ND	2.5	ND	••	ND	ИD	ND	ND
Total Solids (wt%)	74.5	72.8	71.2	69.3	71.1	66.5	58.9	49.0	37.8	**	62.9	72.5	58.0	59.9
Total Organic Chloride (ppm/wt)	<1	132.0	279.0	<1	<1	13.0	405.0	45.0	<1.0	**	<1	13.0	379.0	766.0
BTU/lb	14,587	11,148	12,221	9,349	9,605	9,569	11,571	9,668	8,236	••	7,903	12,260	8,589	8,088
Estimated Inventory (X 1,000 gal)	;	780.0		130.0	130.0	130.0	7.5	16.0	16.0	6:0	7.5	6.5	850.0	285.0

^{• -} Due to physical characteristics of sample, analysis for this parameter was not possible
•• - No sample collected for these parameters



SBA SHIPYARDS, INC. SUMMARY OF TCLP & RCI ANALYTICAL RESULTS AT SBA FROM 10/25/95 SAMPLING EVENT

						_ `_									
ANALYTE	ОР-А	OP-B	OP-C	WT-1	WT-2	WT-3	WT-6 ≿(AT-1)∉	WT-7 △(AT÷2)	WT-8 (OT-1)	АТ-З	OT-2	0Т-3	OT-4	ST-1	LTU
Benzene	0.01									ND		0.12	Pilop t :	1.0	0.16
Chloroform	ND	ND	ND	ND	ND	ND	0.13	'ND'	ND	ND	ND	ND	0.12	0.29	ND
1,2-Dichloroethane	ND	0.24		ND	ND	0.063	11.1	ND	ND	ND	ND	ND			ND
Tetrachloroethene	ND	0.079	0.18	ND	ND	DN	0.54	ND	ND		ND	ND	0.49		ND
Trichloroethene	ND	0.076	0.19	ND	ND	ND	0.1	ND	ND	ND	ND	ND	0.19	0.27	ND
Vinyl chloride	ND	ND	ND		1,5	4,39			ND	ND	0.15	()/cr c e	0.16	ND	ND
ortho-Cresol	0.054	0.75	3.2	0.69	0.41	2.6	2.5	0.83	0.18	ND	0.26	5.2	4.6	1.6	0.22
meta-Creso!	ND	2.0	8.9	1.7	.89	7.0	6.2	2.1	0.39	ND	0.64	17.0	12.0	4.7	0.38
Pyridine	ND	ND	0.091	ND	ND	0.09	0.079	ND	ND	ND	ND	ND	0.3	ND	ND
Arsenic	ND.	ND	.ND	ND	ND	ND	ND	ND	0.112	ND	ND	ND	0.049	ND	0.111
Barium	0.332	0.419	0.341	0.677	0.558	0.878	ND	0.397	1.26	ND ·	ND	0.76	0.875	0.331	2.12
Chromium	*0.102	*0.096	*0.066	BND	BND	*0.008	*0.01	*0.011	0.017	*0.041	*0.012	*0.07	*0.052	BND	0.046
Lead	ND	0.020	ND	ND	ND	ND	ND	ND	0.043	ND	ND	ND	ND	ND	0.064
Selenium	ND	ND	ND	ND	ND	ND	ND	ND	0.053	ND	ND	ND	ND	ND	0.083
Sulfide (Reactivity)	ND	76.0	127.0	59.0	ND	59.0	ND	119.0	34.0	42.0	59.0	51.0	ND	ND	25.0
Ignitability (°F)			11	>150		>150	10	>150	>150	>150		>150	1,17		> 150
pH (S.U.)	5.45	5.6	6.12	6.15	6.85	6.09	6.82	6.59	6.45	6.61	5.79	6.45	6.23	6.75	6.87

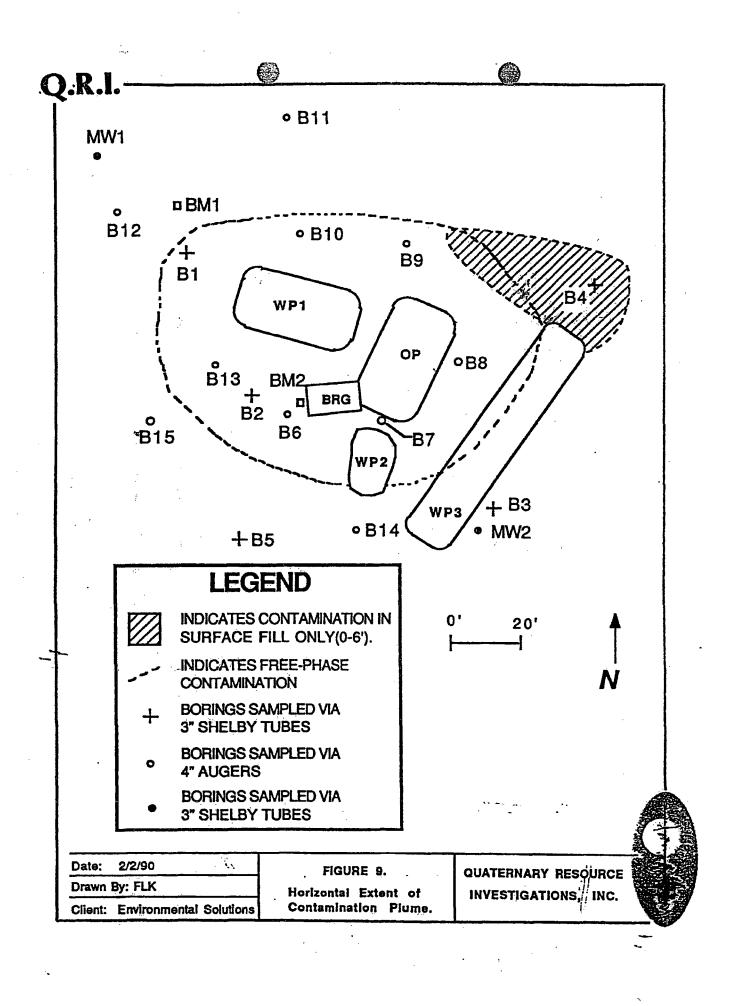
>All concentrations are in milligrams per liter (mg/l or ppm) unless otherwise indicated after the analyte description.

> ishinged/Boldett numbers = concentrations that exceed the TCLP regulatory limit (are equal to or greater than limit unless otherwise indicated) listed below for each analyte: Benzene = 0.5 ppm; Chloroform = 6.0 ppm; 1,2-Dichloroethane = 0.5 ppm; Tetrachloroethane = 0.7 ppm; Trichloroethane = 0.5 ppm; Vinyl chloride = 0.2 ppm; ortho-Cresol = 200 ppm; meta-Cresol = 200 ppm; Pyridine = 5.0 ppm; Arsenic = 5.0 ppm; Barium = 100 ppm; Chromium = 5.0 ppm; Lead = 5.0 ppm; Selenium = 1.0 ppm; Sulfide = not quantified; Ignitability = <140°F; pH = <2.0 S.U. or >12.5 S.U.

[➤]ND = not detected

> 1 = these Chromium concentrations represent the sum of the analyte found in both the sample and the method blank.

>BND = this Chromium concentration represents the analyte found in the method blank only. None was detected in the sample.





John Schwab Gerald L. Walter, Jr.

William E. Hodgkins Anne Jordan Crochet John F. Derenbecker J. Lee Alcock, Jr. Brent B. Boxill 10636 Linkwood Court Baton Rouge, Louisiana 70810-2854 Telephone (504) 767-1460 Fax (504) 769-0010

April 12, 1996

VIA FACSIMILE AND MAIL

Ms. Nelly M. Rocha
Enforcement Counsel
U.S. Environmental Protection Agency, Region VI
1445 Ross Avenue
Ste. 1200, Mail Code 6EN-LH
Dallas, Texas 75202

Re:

Update on Efforts to Close Waste Management Activities

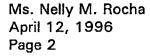
SBA Shipyards, Inc. Jennings, Louisiana LAD008434185

Dear Ms. Rocha:

In response to our most recent conversations with you and Mr. Greg Pashia, the following discussion sets forth the recent progress that has been made to effect the closure and cleanup of historical waste management activities at SBA Shipyards, Inc. ("SBA"). SBA appreciates the willingness of the U.S. Environmental Protection Agency ("EPA") to allow SBA to pursue a voluntary remediation and closure solution to its environmental problems.

Sampling and Characterization of Tanks and Impoundments

On October 25, 1995, an extensive sampling effort was performed on the tanks, surface impoundments and "land treatment unit" at SBA. The samples were analyzed for a variety of chemical constituents and physical parameters. The purpose of the effort was to obtain the analytical data necessary to make proper hazardous waste determinations and to provide other needed information for the development of on-site and off-site treatment and/or disposal options.



Initial Evaluation of Options for On-Site and Off-Site Management

The analytical data from the sampling effort discussed above was evaluated to begin the development of options for the management of the residuals at SBA. These options included reuse/recycling in fuels programs or as feedstocks, in-situ treatment and closure, and off-site treatment and disposal. Unfortunately, the options for in-situ treatment and closure could not be properly developed without a treatability study which is discussed in more detail below. Off-site options for the tank contents were very limited due to the fact that the tank materials are predominantly comprised of very stable emulsions with a very high water content and the presence of hazardous constituents that resulted in some, as yet, unanswered questions regarding options for reuse/recycling of this material. The contents of the tanks are being evaluated for possible treatment to separate the water and organics to minimize the costs of recovery, treatment and/or disposal.

Request for Voluntary Contribution from Current and Former Customers

On March 8, 1996, a letter was sent to 22 current and former customers ("Customers") of SBA requesting that they participate in a voluntary funding of the remediation and closure activities at SBA. The letter informed the Customers that residues from the cleaning of their barges were present at SBA in surface impoundments and tanks which are the subject of near-future closure and remediation activities. The belief that a free phase hydrocarbon layer may be present beneath the surface impoundments was also conveyed in the letter. Attached to the letter was a list containing the name/number of each barge the individual Customer had cleaned at SBA, the approximate date each barge was cleaned, and the last three cargoes each barge contained prior to being cleaned at SBA.

A follow-up letter was sent to the same 22 Customers on March 22, 1996 to which the following was attached: 1) a list of all of the 22 Customers, whose barges were cleaned at SBA, along with their addresses, phone numbers and contact names, and each of the Customer's barge information that was previously submitted separately to each party in the March 8 letter; 2) a history of the DEQ and EPA actions at SBA along with any related correspondence; 3) a description of the known environmental impacts at SBA; 4) a summary of results from conventional analyses performed on the contents of the surface impoundments and tanks; 5) a summary of the results from TCLP and RCl analyses performed on the contents of the surface impoundments and tanks; and 6) a drawing from a 1990 report depicting an estimate

Ms. Nelly M. Rocha April 12, 1996 Page 3

of the horizontal extent of the phased hydrocarbon layer and groundwater contaminant plume in the vicinity of the surface impoundments.

Currently, SBA is reviewing its records and preparing a list of the volumes of residues removed from each barge for each Customer. Upon completion of this record review, which is anticipated to be completed in approximately one week, a letter will be sent to the 22 Customers that will contain: 1) a listing of the volumes of residues removed from each barge from each Customer; 2) information on the recent subsurface investigation and the treatability study which is described below; 3) options and cost estimates for remediation and closure; and 4) a date and meeting location to discuss the scope, cost and participation for each of the Customers in the upcoming remediation and closure activities.

Subsurface Investigation

On March 28, 1996, two borings were advanced in the area of the surface impoundments for purposes of establishing a "fingerprint" for the constituents present in the phased hydrocarbon layer believed to be present in the vicinity of the surface impoundments. The soil and liquid samples collected from these borings are currently being analyzed for volatiles, semi-volatiles and metals. Upon receipt, the analytical data will be forwarded to the 22 Customers and the environmental contractor that is performing the treatability study and preparing the closure and remediation cost estimate. The analytical data, treatability study and cost estimates will be forwarded to the 22 Customers in advance of the anticipated meeting referenced above.

Treatability Study and Closure/Remediation Cost Estimates

On April 9, 1996, Environmental Solutions, Inc. ("ESI"), a TRC company, sampled the surface impoundments at SBA for purposes of conducting a treatability study that will be used as the basis for the preparation of the closure and remediation plan for the waste management areas at SBA. Upon completion of their treatability study, ESI will also prepare cost estimates for the closure and remediation activities. As noted above, the study and cost estimates will be forwarded to the 22 Customers in advance of the anticipated meeting.

Ms. Nelly M. Rocha April 12, 1996 Page 4

Closure and Remediation Plan Development

Upon completion of the treatability study and closure/remediation cost estimates, the above referenced meeting will be scheduled with the 22 Customers regarding the funding of the closure and remediation activities. At this meeting, or shortly thereafter, a firm will be selected to conduct the RI/FS and prepare the closure and remediation plan that will be submitted for approval to EPA and/or DEQ.

If it becomes evident at or shortly after the Customer meeting that there may be insufficient voluntary support for the funding of the requisite closure and remediation activities, SBA will contact all 22 Customers and confirm their position on voluntary funding. If insufficient support is confirmed, EPA and DEQ will be promptly notified and all of the information pertaining to a determination of the relative liability for each of 22 Customers will subsequently be forwarded to EPA and DEQ.

If you or Mr. Pashia should require copies of any of the information or data discussed above or have any questions related thereto, please contact the undersigned or Mr. J. Mike DiGiglia of our office at your convenience.

Very truly yours,

SCHWAB & WALTER

Gerald L. Walter, JR/

GLWjr

C: Mr. Greg Pashia - EPA Region VI
 Mr. Louis Smaihall - SBA
 SBA Customers



Schwab & Walter Attorneys at Law

John Schwab Gerald L. Walter, Jr.

William E. Hodgkins Anne Jordan Crochet John F. Derenbecker J. Lee Alcock, Jr. Brent B. Boxill 10636 Linkwood Court Baton Rouge, Louisiana 70810-2854 Telephone (504) 767-1460 Fax (504) 769-0010

April 24, 1996

Duke Gremillion Tallen Marine P.O. Box 1040 Lake Arthur, LA 70549

RE: Follow Up to Request for Voluntary Funding and Notice of

Proposed Meeting SBA Shipyards, Inc.

Dear Mr. Gremillion:

As indicated in the April 12, 1996 letter to the U.S. Environmental Protection Agency of which you received a copy, SBA Shipyards, Inc. ("SBA") has had the surface impoundments sampled by TRC Environmental Solutions, Inc. ("TRC") for purposes of conducting a treatability study and preparing a remediation and closure cost estimate. TRC has indicated that the results of the study and its cost estimates will be available by May 15, 1996. TRC is conducting the treatability study and preparing the remediation and closure cost estimate at no cost with the understanding that it will not be precluded from being considered as a bidder for conducting the actual closure and remediation activities.

Accordingly, we are proposing a meeting on Wednesday, May 29, 1996 in Lafayette, Louisiana at a location to be announced at a later date and inviting those we believe may be included as SBA's current and former customers. If you would like to attend the meeting, whether you believe you are or have been a customer, please advise.

If you are planning on attending, we will endeavor to provide you with a summary of the results of TRC's treatability study and their remediation and closure cost estimate at least three to four days in advance of the proposed meeting date. A proposed agenda for the meeting is attached. Please review the proposed agenda and fax me any suggested revisions that you feel are appropriate.

Duke Gremillion April 24, 1996 Page 2

If you should have any questions in the interim, please do not hesitate to contact the undersigned, or J. Mike DiGiglia of our office, at your convenience.

Sincerely,

SCHWAB & WALTER

WEH/mr

Enclosure: Proposed Agenda for May 29, 1996 SBA Customer Meeting



John Schwab Gerald L. Walter, Jr.

William E. Hodgkins Anne Jordan Crochet John F. Derenbecker J. Lee Alcock, Jr. Brent B. Boxill 10636 Linkwood Court Baton Rouge, Louisiana 70810-2854 Telephone (504) 767-1460 Fax (504) 769-0010

April 26, 1996

Duke Gremillion
Tallen Marine
P.O. Box 1040
Lake Arthur, LA 70549

RF.

Follow Up to Request for Voluntary Funding and Results From

Subsurface Investigation

SBA Shipyards, Inc.

Dear Mr. Gremillion:

As previously indicated, SBA Shipyards, Inc. ("SBA") had made arrangements to perform a preliminary subsurface investigation to verify their suspicions that a free-phase hydrocarbon layer is present in the subsurface stratum between the bottom of the surface impoundments and the upper surface of the water table. A report containing the results of this investigation is attached for your review.

If you should have any questions regarding the foregoing, please do not hesitate to contact the undersigned, or J. Mike DiGiglia of our office, at your convenience.

Sincerely,

SCHWAB & WALTER

Villiam E. Hodokins

WEH/mr

Enclosure:

Subsurface Sampling Investigation

by Jesco Environmental & Geotechnical Services, Inc.



Environmental & Geotechnical Services, Inc.

Mr. Mike Di Giglia Schwab and Walters 10636 Linkwood Court Baton Rouge, LA 70810-2854

Re:

Subsurface Sampling Investigation

SBA Shipyards
Jennings, Louisiana

Dear Mr. Di Giglia:

On March 28, 1996 Jesco Environmental and Geotechnical Services, Inc. (Jesco) conducted two soil borings (A and B) in the areas outlined in your March 20, 1996 fax.

The two soil borings were conducted utilizing direct push technology. Discreet soil samples were obtained throughout the entire depth of the borehole. These samples were logged and head space analysis was conducted on each sample using a photo ionization detector.

When the first unconfined aquifer was reached soil sampling was discontinued. The borings were then over drilled using a trailer mounted drilling rig. Two 2 inch diameter temporary wells were then set and allowed to recharge. Water samples were then collected from the temporary wells utilizing disposable polyethylene bailers. The water samples were submitted to the laboratory following the proper chain of custody procedures and analyzed for Volatiles (EPA Method 624), Semi-Volatiles (EPA Method 625) and Total Metals (EPA Methods 200.7, 206.3, 245.1 and 270.3). After sample collection, the wells were removed and the boreholes were plugged and abandonded.

Field observations indicated the presence of NAPL in both soils and groundwater. Headspace analysis also indicated the presence of volatile organic compounds. These observations are noted on the soil boring logs. Laboratory analysis indicated the presence of both volatile and semivolatile compounds in both of the groundwater samples collected. Phenolic compounds were also detected in Sample A. Although no background sample was collected and analyzed for comparison purposes, Total Metal concentrations for these samples do not appear to be of environmental concern.

Please find enclosed the laboratory data, chain of custody, soil boring logs and a field map indicating the locations where the samples were collected.

Jesco appreciates the opportunity to provide our services to your company. If we can be of further assistance please contact or office at (318)-824-9074.

Sincerely,

Alvinette Teal, P.G.

cc: Mr. Louis Smaihall, SBA Shipyards, Inc.

Jesco

Environmental & Geotechnical Services, Inc.

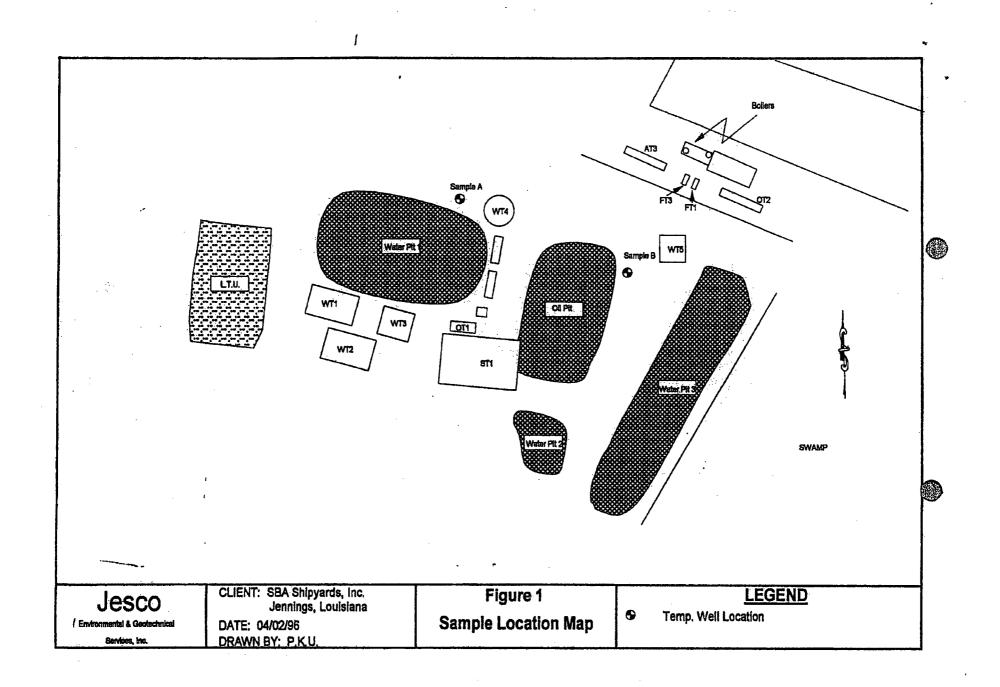
Soil Boring Log

Project#	153				Borehole# A	Drill Method: DPT
	cation: Jen	ninae I	Δ		Depth: 14 ft	Geologist: A. Teal
				·	Diameter: 1.125*	
Surrace E	levation: N				Upiticis. 1.120	Driller: W. Schexnider
Depth(ft)	Symbol	saldwas	Penetrometer	PID Resulting	Material Description	Remarks
-	<u> </u>		<0.5	30	2.5 YR 2.5/1 Reddish black sandy s	Brittle, Noncohesive, mild hydrocarbon odor
2			1.25	7	10 YR 7/2 Lt. grey clay with ferric inclusions	Plastic, cohesive, moist, slight hydrocarbon odor
•			0.5	78	10 YR 7/2 Lt. gray silly clay with ferric inclusions	Plastic, cohesive, moist, slight hydrocarbon odor
-			0.5	54	10 YR 7/2 LL gray slity clay with ferric inclusions	Plastic, cohesive, moist, slight hydrocarbon odor
8			0.5	·197	10 YR 3/3 Dark brown sandy slit	Hydrocarbon stained, strong Hydrocarbo odor, saturated with NAPL, cohesive, nonplastic
- 10			<0,5	373	10 YR 3/3 Dark brown sandy six	Hydrocarbon stained, strong Hydrocarbo odor, saturated with NAPL, cohesive, nonplastic
12			<0.5	373	10 YR 3/3 Dark brown sandy slit	Hydrocarbon stained, strong Hydrocarbo odor, saturated with NAPL, cohesive, nonplastic
- 14 - 16					Borehole terminated.	
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emarks:		1 i		<u></u> _		

Jesco Environmental & Geotechnical Services, Inc.

Soil Boring Log

oject#	me: SBA S 153				Borehote# B	Drill Method: DPT
	cation: Jenr	inas. I	Geologist: A. Teal			
	levation: N				Depth: 14 ft Diameter: 1.125	Driller: W. Schexnider
	RAGION. 14		b z	-	1.12	Dillia. VV. Odrozi (Ma
Depth(ft)	Symbol	samples	Penetrometer	PID Reading		
			<u> </u>		Material Description	Remarks
			1.5	116	25 YR 2.5/1 Reddish black clay	Brittle, Noncohesive, strong hydrocarbon odor
			0.5	92	10 YR 6/2 Lt. brownish gray silty clay	Nonplastic, cohesive, strong hydrocarbon odor
_			1.5	140	10 YR 6/2 Lt. browniah gray ality clay	Plastic, cohesive, moist, strong hydrocarbon odor
-8			<0.5	183	10 YR 7/2 Lt. brownish gray sity clay	Plastic, cohesive, moist, strong hydrocarbon odor
8			<0.5	221	10 YR 7/2 Lt. brownish gray clayey siit	Strong Hydrocarbon odor, saturated with NAPL, cohesive, plastic
10			<0.5	107	10 YR 7/2 Lt. brownish gray sandy clay	Strong Hydrocarbon odor, saturated with NAPL, cohesive, plastic
7 12			<0.5	192	10 YR 7/2 Lt. brownish gray sand	Strong Hydrocarbon odor, saturated with NAPL, cohesive, plastic, wet
14					Borehole terminated.	
- 16					paratitia tattiminaés.	
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316 Mecca Drive Lafayette, LA 70508-3306

Received: 03/29/96

SHERRY LABORATORIES

NDIANA

LOUISIANA James Laboratories OKLAHOMA

Lafayette, LA 70598-1816 Fax 318-233-6540

P.O. Box \$1816

800-737-2378

Telephone (318) 235-0483

SHERRY LABS LA

TEST REPORT

Work Order # 96-03-605

04/16/96 11:35:29

ATTEN	ALVINETTE TEAL		•	PREPARED	SHERRY LABORATORIES LOUISIANA
REPORT	JESCO ENV & GEO SERVICES	INC		BY	P O BOX 81816
TO	P O BOX 1324	3 1	30		316 MECCA DRIVE
	JENNINGS LA 70546-1324		CERTIFIED BY		LAPAYETTE LA 70598-1616
•• 1	14,			ATTEN	ENVIRONMENTAL LABORATORY
V.			CONTACT JERRY		(318) 235-0483
CLIEST	JESCO ENV SAMPLE	8 2			
COMPANY	JESCO ENV & GEO SERVICES	INC	JERRY LANDRY		LAURA JAHKOWER
PACILITY			VICE-PRESIDENT/LAB	MANAGER	QUALITY ASSURANCE MANAGER
	BEEPER - 821-0588				
WORK ID	SBA - PROJECT #153				
	3/28/96 BY W. SCHEXNIDER				
	HAND DELIVERED				
•	WATER				
P.O. #					
THVOICE	under separate cover				
. 3					
Sample	IDENTIFICATION		TEST CODES as	BENER DE	seed on this workorder
01 8BA -	SAMPLE A	8240	VOA'S - METHOD 6240 L	IST	·
02 BBA -	SAMPLE B	ACEXT	ACID EXTRACTABLES-GC/	48	
		AG	SILVER		
•		AS	ARSENIC		
-		BA	BARTUM		
et .		BNEXT	B/W EXTRACTABLES-GC/MS	3	•
		CD	CADHĨÚN		•
	-	CR	CERONIUM		
	•	RG	MERCURY		
w.		PB _	LEAD		•
•	· · · · · · · · · · · · · · · · · · ·	SE	SELENIUM		
		zn	ZINC		

TOTAL PAGES OF THIS REPORT: THIS REPORT SHALL NOT HE REPRODUCED EXCEPT IN FULL, WITHOUT THE WRITTER APPROVAL OF SHERRY LABORATORIES

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Page 2

SHERRY LABORATORIES

INDIANA

9603606-01A

LOUISIANA

OKLAHOMA

James Laboratories

DATE REPORTED: 04/16/96

P.O. Box 81816 Lafayette, LA 70598-1816 Fax 318-233-6540 800-737-2378

SAMPLE DESCRIPTION

SBA - SAMPLE A

DATE COLLECTED: 03/28/96 11:30

LAB I.D.

LABORATORY REPRESENTATIVE SHERRY LABORATORIES LA

ANALYTE	AWALYST IWITIALS	DATE ABALYSED	REFERENCE METHOD	DETECTION LIMIT	CONCENTRATION DDM
SILVER	TS	04/03/96	EPA 200.7	0.007 ppm	BDL
ARSENIC	. T8	04/03/96	BPA 206.3	0.0004 _. ppm	0.0506
*BARIUM	78	04/03/96	BPA 200.7	0.004 ppm	2.33
CADNIUN	TS	04/03/95	BPA 200.7	0.005 ppm	BDL
- CHROMIUX	TS .	04/03/96	EPA 200.7	0.007 ppm	0.017
MERCURY	TS	04/10/96	BPA 245.1	0.00002 ppm	0.00018
LEAD	TS	04/03/96	EPA 200.7	0.050 ppm	BDL
*SELBRIUM	TS	04/03/96	EPA 270.3	0.00004 ppm	0.00062
BIRC	TS	04/03/96	EPA 200.7	0.002 ppm	0.599





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LAB I.D.	9603606-01A	DATE	REPORTED:	04/16/96
SAMPLE DES	CRIPTION BBA CTED: 03/28/96		<u> </u>	

DATE EXTRACTED 04/05/96 DATE INJECTED 04/11/96 ANALYST OMC METHOD MPA 625

CONFORM	RESULT	COMPOUED RESULT
benzoic acid _	ND	2-nitrophenol ND
2-chlorophenol _	ND	4-nitrophenol <u>ND</u>
2,4-dichlorophenol	ND	p-chloro-m-cresol <u>ND</u>
2,4-dimethylphenol _	ND.	pentachlorophenol <u>ND</u>
2,4-dinitrophenol	ND *	phenol <u>0.47</u>
2-methyl-4,6-dinitro-phenol _	** <u>an</u>	tetrachlorophenol <u>ND</u>
2-methyl phenol _	0.36	2,4,5-trichlorophenol <u>ND</u>
4-methyl phenol _	0.23	2,4,6-trichlorophenol ND
-		

All	results	rep	01	rted	in		РРШ	nnless	otherwise	specified.
	1	ND	-	not	de	tected	at	0.20	ppm	
	1	#D*	=	not	det	tected	at	0.40	ppm	
	1	#D * *	_	not	dei	tected	at	1.0		

SURROGATE RECOVERIES	(*)
PHEROL-D5	<u>ND</u>
2-FLUOROPHENOL	<u>MD</u>
2,4,6-TRIBROMOPHENOL	ND







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James Laboratories

LAB I.D. 9603606-01A DATE REPORTED: 04/16/96

SAMPLE DESCRIPTION BBA - SAMPLE A

DATE COLLECTED: 03/28/96 11:30

OKLAHOMA

Date Analyxed: 04/11/96 ANALYST CHC Date Extracted: 04/05/96 Method: EPA 625

REBULT	COMPOUND	RESULT	COMPOUND	RESULT	COMPOURD
ND	hexachlorocylclopentadiene	ND	4-chlorophenyl phenyl ether	0.51	acenaphthene
ND	hexachloraethane	<u> </u>	оргуведе	ND	acenaphthylene
ND	indenc (1,2,3-cd) pyrone	ND*	dibenzo (a,h) anthracene	<u>008</u>	aniline
ND	1sophorone	0.48	dibenzofuran	1.6	anthracene
0.69	2-methylnaphthalene	ND	1,2 dichlorobenzene	ND	benzidine
5,1	naphthalene	ND	1,3 dichlorobenzene	0,37	penzo (a) antiracene
ND	2-nitrosniline	ND	1,4 dichlorobenzene	ND	benzo (a) pyrene
ND	3-nitrosniline	ND	3,3 dichlorobenzidine	MD	Denzo (b) fluoranthene
ND	4-nitroaniline	ND	diethýl phthalate	<u>ND</u> *	benzo (ghi) perylene
ND	nitrobenzene	ND	dimethyl phthalate	ND	benzo (k) fluoranthene
ND	N-nitrosodimethylamine	ND	di-n-butyl phthalate	ND	bensyl alcohol
ND	N-nitrosodiphenylemine	ND	dinitrobenzene	ND	beazylbutyl phthalate
ND	W-nitrosodipropylamine	ND	2,4-dinitrotoluene	MD	bis_(2-chlorethoxy)methane
ND	phenanthrene	<u> </u>	2,6-dinitrotoluene	ND	bis (2-chloroethyl)ether
ND*	2-picoline	<u>nd</u>	di-n-octyl phthalate	ND	is (2-chlorisopropyl) ether
0.61	pyrene	ND	1,2-diphenylhydrazine	ND	is (2-ethylhexyl) phthalate
ND	pyridine	0.83	fluoranthene	ND	4-bromophenyl phenyl ether
HD	tetrachlorobensene (s)	_0.71	fluorene	<u>80</u>	carbazole
ND	toluendiamine	ND	hexachlorobenzene		4-chloroaniline
MD	1,2,4 trichlorobenzene	NO	bexachlorobutadiene	ND	2-chloronaphthalene
ES (%)	SURROGATE RECOVERIE	,	·		·

All results reported in ppm unless otherwise specified.

ND = not detected at detection limit 0.20 ppm ND = not detected at detection limit 0.40 ppm ND == not detected at detection limit 1.0 ppm

2-fluorobiphenyl ___

nitrobengene-d5

terphenyl-d14







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INDIANA

LOUISIANA OKLAHOMA

James Laboratories

LAB I.D. <u>9603606-01A</u> DATE REPORTED: <u>04/16/96</u>

SAMPLE DESCRIPTION SEA - SAMPLE A

DATE COLLECTED: 03/28/96 11:30

Jens Landing

AMALYST GMC Date Analyzed: 04/04/96 Method EFA 624

COMPOUND	RESULT	COMPOUND	RRSULT	COMPOUND RESIDET
acetone	BDL	chloromethane	BDL	pareldehyde <u>BDL</u>
acrolein	BDL	dichlorodifluoromethane	BDL	styrene <u>BDL</u>
acrylonitrile	BDL	1,1-dichloroethane	BDL	1,1,2,2-tetrachloroethane <u>BDL</u>
benzene	1.5	1,2-dichlorosthane	BDL	tetrachloroethylene <u>BDL</u>
bis (chloromethyl) ether	BDL	1,1-dichloroethylene	BDL	toluene 1.3
bromodichloromethane	BDL	1,2-trans-dichloroethylene	BDL	1,1,1-trichloroethane <u>BDL</u>
bromoform	BDL .	1,2-dichloropropane	BDI.	1,1,2-trichloroethane BDL
bromomethane	BDL	cis-1,3-dichloropropylene	BOL	trichloroethylene <u>BDL</u>
carbon disulfide	BDL	trans-1,3-dichloropropylene	BDI.	vinyl acetate <u>BDL</u>
carbon tetrachloride	BOL	ethylbenzene	BDL	vinyl chloride <u>BDL</u>
chlorobenzene	BDL	fluorotrichloromethane	BDL	o-xylene
chlorodibromomethane	BOL	2-haxanone	BDL	m-xylene TOTAL 1.9
chloroethane	BDL	methylene chloride	1.4	p-xylene
2-chloroethylvinyl ether	BDL	methyl-isobuytl-ketone	BDL	1,2 dichlorobenzene <u>BDL</u>
chloroform	BOL	methyl-ethyl-ketone	BDL	1,3 dichloropensene <u>RDL</u>
		† 	i	methyl methacrylate <u>EDL</u>

All results reported in ppm unless otherwise specified. ND = not detected at detection limit 1.0~ppm

ND** = not detected at 50 ppb ND* = not detected at 100 ppb

BURROGATE RECOVERIES	(*)
1,2 DICHLOROFTHANE-D4	107
TOLUENE-D8	100
BROMOFLUOROBENZENE	. 92







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LOUISIANA James Laboratories OKLAHOMA

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P.O. Box 81816

Page 6

LAB I.D.

9603606-02A

DATE REPORTED: 04/15/96

SAMPLE DESCRIPTION SEA - SAMPLE B

DATE COLLECTED: 03/28/96 12:45

LABORATORY REPRESENTATIVE SHERRY LABORATORIES LA

AVALYIB	ABALYST IBITIALS	<u>avalverd</u>	REFERENCE	LIHIT.	DPM CONCRETERATION
SILVER	. TS O	4/03/96	BPA 200.7	0.007 ppm	HOL
ARSENIC	TS O	4/03/96	BPA 205.3	0.0004 ppm	0.0152
BARIUM	TS 0	4/03/96	EPA 200.7	0.004 ppm	1.88
ÇADNIUH	TS 0	4/03/96	BPA 200.7	0.005 ррш	BDL
CEROMIUM	TS 0	4/03/96	BPA 200.7	0.007 ррш	0.015
MBRCURY	TS 0	4/10/95	BPA 245.1	0.00002 ppm	, 0.00010
LBAD	TS 0	4/03/95	BPA 200.7	0.050 ppm	BDL
SELENIUM	TS 0	4/03/96	EPA 270.3	0.00004 ppm	0.90034
SINC	TS O	4/03/96	EPA 200.7	0.002 ppm	0.263





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SHERRY LABORATORIES OKLAHOMA

INDIANA

LOUISIANA

James Laboratories

LAB I.D. 9603606-02A DATE REPORTED: 04/16/96

SAMPLE DESCRIPTION SEA - SAMPLE B DATE COLLECTED: 03/28/95 12:45

Laboratory Representative

DATE EXTRACTED 04/05/96 DATE IEJECTED 04/11/96 ANALYST GMC METHOD ERA 625

COMPOUND RESULT	COMPOUND RESULT
benzoic acidND	2-nitrophenol <u>ND</u>
2-chlorophenol ND	4-nitrophenol <u>ND</u>
2,4-dichlorophenol <u>ND</u>	p-chloro-m-cresol <u>ND</u>
2,4-dimethylphenol <u>ND</u>	pentachlorophenol <u>ND</u>
2,4-dinitrophenol ND *	phenol <u>ND</u>
2-methyl-4,6-dinitro-phenol ND **	tetrachlorophenol ND
2-rethyl phenol ND	2,4,5-trichlorophenol <u>MD</u>
4-methyl phenol	2,4,6-trichlorophenol ND

All	results	reported	in	PPM	unless	otherwise	specified.
-----	---------	----------	----	-----	--------	-----------	------------

ND = not detected at _ 50 ppm ND# = not detected at _100 ppm ND**= not detected at 200 ppm

SURROGATE RECOVERIES	(*)
PHENOL-D5	ND
2-FLUOROPEENOL	<u>ND</u>
2 4 6 TOT TOOL OF THE	







Hethod:

terphenyl-d14

EPA 625

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SHERRY LABORATORIES

INDIANA

LOUISIANA OKLAHOMA

James Enboratorias

Date Analyzed: 04/11/96

Lafayette, LA 70598-1816 Fax 318-233-6540

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P.O. Box \$1816

T. 3 78	I.D.	9603506-02A
100	4.0.	3003000 020

DATE RETORTED: 04/16/96

Date Extracted: 04/05/96

SAMPLE DESCRIPTION

BBA - BANFLE B

RD * = not detected at detection limit 100 ppm ND **= not detected at detection limit 200 ppm

DATE COLLECTED: 03/28/96 12:45

ANALYST GIC

Laboratory Representative

COMPOUND KRSULT COMPOUND RESULT COMPOUND RESULT 150 4-chlorophenyl phenyl ether _ ND acenaphthene hexachlorocylclopentadiene ND acenaphthylene chrysene ND hexachloraethane ND aniline _ dibenzo (a,h) anthracene HD ND* indeno (1,2,3-cd) pyrene ND* 120 anthracene 550 dibenzofuran _ isophorone ___ ND 1,2 dichlorobenzene bengidina ND MD 2-methylnaphthalene 160 1,3 dichlorobenzane benzo (a) anthracene ND ND naphthalene __810 benzo (a) pyrene _ 1,4 dichlorobenzene 2-nitroaniline <u>ND</u> benzo (b) fluorenthene _ 3,3 dichlorobenzidine _ 3-nitroaniline ND ND HD diethyl phthalate __ 4-nitroaniline _____ND ND* benzo (ghi) perylene _ ND benzo (k) fluoranthene dimethyl phthalate nitrobenzene ND ND ND di-n-butyl phthalate _ H-mitrosodimethylamine ND benzyl alcohol MD KD benzylbutyl phthalate ND dinitrobenzene _ ND N-nitrosodiphenylamine MD bis (2-chlorethoxy)methane 2,4-dimitrotoluene ND N-nitrosodipropylamine <u>MD</u> ND bis (2-chloroethyl)ether ND 2,6-dimitrotoluene ND phenanthrone ND bis (2-chlorisopropyl) ether di-n-octyl phthalate 2-picoline ND** ND ND bis (2-ethylhexyl) phthalate _ 1,2-diphenylhydrazine pyrene ___220 4-bromophenyl phenyl ether _ fluoranthene _ 280 pyridine ____ND** ND tetrachlorobensene (s) <u>ND</u> carbazole _ ND fluorene _ 180 4-chloroaniline ND hexachlorobenzene toluendiamine _ ND 2-chloronaphthalene hexachlorobutadiene 1,2,4 trichlorobenzene SURROGATE RECOVERIES (%) All results reported in ppm unless otherwise specified. 2-fluorobiphenyl ND - not detected at detection limit _ .50 ppm mitrobenzene-d5;





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SHERRY LABORATORIES

INDIANA

LOUISIANA OKLAHOMA

James Laboratories

LAB I.D. 9613606-02A DATE REPORTED: 04/15/96

SAMPLE DESCRIPTION SEA - SAMPLE B

DATE COLLECTED: 03/28/96 12:45

MEGRATORY REPRESENTATIVE

ARALYST CHC Date Analyzed: 04/04/96 Method EPA 624

CONGOUND	HEBULT	CO OCCURD	RESULT	COMPOUND RESULT
				_
acetone	BDL	chloromethane	BDL	paraldehyde BDL
acrolein	BDL	dichlorodifluoromethane	BDL	styrene <u>BDL</u>
acrylonitrile	BDL	1,1-dichlorcethane	BDL	1,1,2,2-tetrachloroethane BDL
benzene	2.7	1,2-dichloroethane	BDL	tetrachloroethylene 4.1
bis (chloromethyl) ether	BDL	1,1-dichloroethylene	BDL	toluene
bromodichloromethane	BDL	1,2-trans-dichloroethylene	BDL	1,1,1-trichloroethane BDL
bromoform	BDL	1,2-dichloropropane	BDL	1,1,2-trichloroethane <u>BDL</u>
browomethane	BDL	cis-1,3-dichloropropylene	BDL	trichlorcethylene <u>BDL</u>
carbon disulfide	BDL	trans-1,3-dichloropropylene	BDL	vinyl acetate <u>BDL</u>
carbon tetrachloride	BDL	ethylbenzene	1.7	winyl chloride BDL
chlorobenzene	BDL	fluorotrichloromethane	BDL	o-xylens
chlorodibromomethane	BDL	2-hexanone	BOL	m-xylene TOTAL
chloroethane	BDL	methylene chloride	BDL	p-xylene
2-chloroethylvinyl ether	BDL	methyl-isobuytl-ketone	BDL	1,2 dichlorobenzene BDL
chloroform	BDL	methyl-sthyl-ketone	BDL	1,3 dichlorobenzene BDL
	ļ	1		methyl methacrylateBDL

All results reported in ppm unless otherwise specified. ND = not detected at detection limit 1.0~ppm

ND** = not detected at 50 ppb ND* = not detected at 100 ppb

SURROGATE RECOVERIES	(#)
1,2 DICHLOROSTHANE-D4	10
TOLURNE-D9	10
BRONOFLUOROBRNERNE	٠. و



629 Washington St., Suite 300	☐ 2203 S. Madi MUNCIE IN 317-747-9000/800 Fax,317-747-	47302 -874-356	31	.AFA` 8-235	YET -0483	3/800-	7050 737-23	8		TI 18-23 F	E. Independence,: JLSA OK 74110 4-7111/800-324- ax 918-234-7152	5 5757
'age of Chain	of Custo	ody	Rec	CO1	rd		- 1842 - 1844 - 1842 - 1844		abora imbe	tory r	603606	,
Client Name: Jesco. Project Name:	SBA	· ,	ner		ř.	Ž	ÿ	Test	s Rec			
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Phone/Fax: 924-9074/824-9076 Sampler's Signat	ture:	oajibalosol	Number/ Type of Container	Matrix		J.	A REAL		[
-Collection - E E Sample Identification / D	escription	<u></u> С	Typi		S	¥ 4.3)	\\\\/\\/	///	[[//	Comment Remark	3/
	Mary of the second seco	HNO	1/8	MuJ		X						ŕ
Sample 4		_	16	nω		X						
JEF/94 11 30 Am X SAMPLE A SAMPLE A SAMPLE A		_	2/	Mw	X							
8/28/96/2:45Am X SAMPLEB		Hw.	1/5	mw		X						
Sample B			16	nw		X						
Sangle B			2/6	neu	X				•			
		f										
											UPS/Fed Airborne/Sl	
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All samples submitted to Sherry Laboratories for analysis are emains with the client submitting the samples. Sherry Labo	accepted on a custo ratories reserves the	dial basi e right t	s only. o return	Owne unu	rship sed s	of the	mater	ial P.	O. umbe	-r		
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SBA SHIPYARDS, INC. SUMMARY OF ANALYTICAL RESULTS FROM JESCO SUBSURFACE INVESTIGATION

JESCO SUBSURFACE INVESTIGATION							
ANALYTE	BORING A RESULTS (ppm)	BORING B RESULTS (ppm)					
Arsenic	0.0606	0.0152					
Barium	2.33	1.88					
Chromium	0.017	0.015					
Mercury	0.00018	0.00010					
Selenium	0.00062	0.00034					
Zinc	0.599	0.263					
2-Methyl phenol	0.36	ND					
4-Methyl phenol	0.23	ND					
Phenol	0.47	ND					
Acenaphthene	0.51	150.0					
Anthracene	1.6	550.0					
Benzo(a)anthracene	. 0.37	. · ND					
Dibenzofuran	0.48	120.0					
Fluoranthene	0.83	280.0					
Fluorene	0.71	180.0					
, 2-Methylnaphthalene	0.69	160.0					
Naphthalene	5.1	810.0					
Pyrene	0.61	220.0					
Benzene	1.5	2.7					
Ethylbenzene	BDL.	1.7					
Methylene chloride	1.4	BDL.					
Tetrachioroethylene	BDL	4.1					
Toluene	1.3	2.9					
Xylene, Total	1.9	7.7					

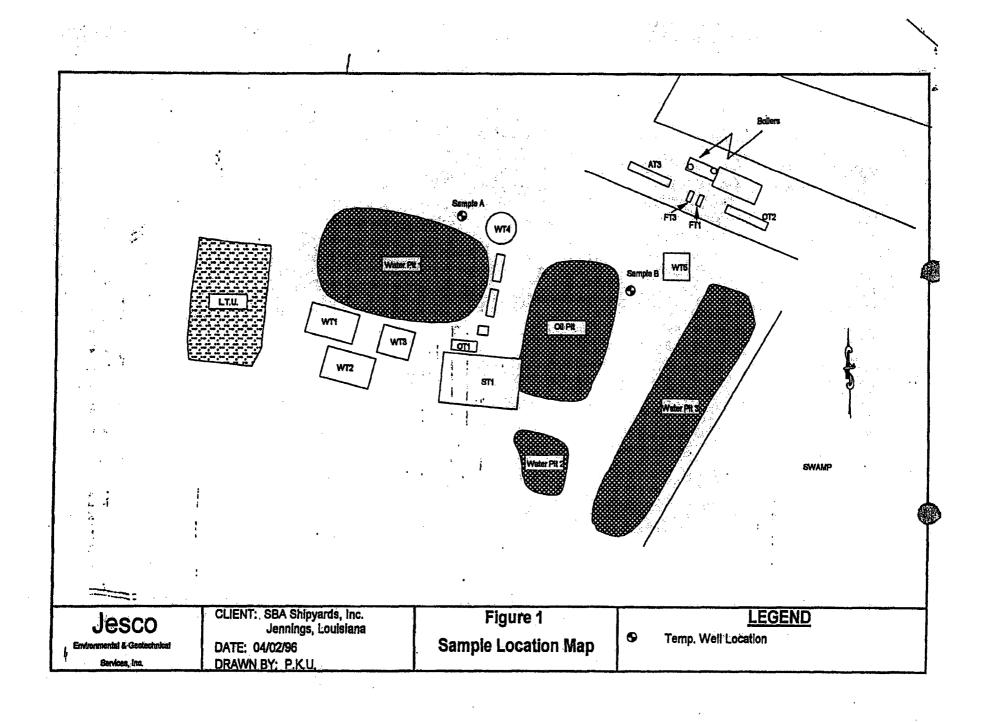
ND = Not Detected

BDL = Below Detection Limit

SBA SHIPYARDS, INC. SUMMARY OF BORING RESULTS FROM JESCO SUBSURFACE INVESTIGATION

DEPTH (Feet Below Ground Surface)	BORING A OBSERVATIONS	BORING B OBSERVATIONS						
0 - 2	Mild Hydrocarbon Odor	Strong Hydrocarbon Odor						
2 - 4	Slight Hydrocarbon Odor	Strong Hydrocarbon Odor						
4 - 6	Slight Hydrocarbon Odor	Strong Hydrocarbon Odor						
6 - 8	Slight Hydrocarbon Odor	Strong Hydrocarbon Odor						
8 - 10	Hydrocarbon Stained; Strong Hydrocarbon Odor; Saturated With NAPL	Hydrocarbon Stained; Strong Hydrocarbon Odor; Saturated With NAPL						
10 - 12	Hydrocarbon Stained; Strong Hydrocarbon Odor; Saturated With NAPL	Hydrocarbon Stained; Strong Hydrocarbon Odor; Saturated With NAPL						
12 - 14	Hydrocarbon Stained; Strong Hydrocarbon Odor; Saturated With NAPL	Hydrocarbon Stained; Strong Hydrocarbon Odor; Saturated With NAPL						

NAPL = Non-Aqueous Phase Liquids





John Schwab Gerald L. Walter, Jr.

William E. Hodgkins Anne Jordan Crochet John F. Derenbecker J. Lee Alcock, Jr. Brent B. Boxill 10636 Linkwood Court Baton Rouge, Louisiana 70810-2854 Telephone (504) 767-1460 Fax (504) 769-0010

May 9, 1996

VIA FACSIMILE AND MAIL

Ms. Nelly M. Rocha
Enforcement Counsel
U.S. Environmental Protection Agency, Region VI
1445 Ross Avenue
Ste. 1200, Mail Code 6EN-LH
Dallas, Texas 75202

Re:

Update on Efforts to Close and Remediate Waste Management Units

SBA Shipyards, Inc. Jennings, Louisiana LAD008434185

Dear Ms. Rocha:

This letter represents a follow up to our April 12, 1996 letter regarding the status of activities at SBA Shipyards, Inc.("SBA"). In accordance with commitment to keep you and Mr. Greg Pashia, the following discussion sets forth the recent progress that has been made to effect the closure and cleanup of historical waste management activities at SBA.

Customer Meeting

A meeting of the former and current customers ("Customers") of SBA that have had barges cleaned at the facility has been set for May 29, 1996. At this meeting, a number of relevant issues will be discussed. A copy of the proposed agenda that was sent to the Customers is attached for your information.

Subsurface Investigation

As stated in our previous correspondence, two borings were advanced in the area of the surface impoundments, on March 28, 1996, for purposes of establishing a "fingerprint" for the constituents present in the phased hydrocarbon layer believed to be present in the vicinity of the surface impoundments. The data generated during the investigation indicated the presence of nonaqueous phase liquids in both the soil and groundwater to depths of 14 feet below ground surface. The horizontal and vertical extent, as well as any rates of migration, have not yet been determined for either the free-phase layer or the saturated plume.

Ms. Nelly M. Rocha May 9, 1996 Page 2

Treatability Study and Closure/Remediation Cost Estimates

As noted in our previous correspondence, TRC Environmental Solutions, Inc. ("TRC") sampled the surface impoundments at SBA on April 9, 1996 for purposes of conducting a treatability study that will be used as the basis for the preparation of the closure and remediation plan for the waste management areas at SBA. TRC has indicated that the results from the treatability study and the cost estimates for the closure and remediation activities will be available on or about May 15, 1996.

Volumes Removed From Barges

SBA has completed its record review and is now in the process of compiling a list of volumes of residues removed from each barge from each Customer, where such information is available. This information will be made available to the Customers for use as one factor in determining the relative liability and contribution requirements for each Customer.

Closure and Remediation Plan Development

At the meeting noted above, discussions will be initiated regarding the scope of work for a request for proposal ("RFP") to be submitted to qualified remediation firms. The RFP will address conducting the RI/FS and preparing the closure and remediation plan that will be submitted for approval to EPA and/or DEQ. Time tables for RFP submittals, due dates or closure/remediation plan submittal have not yet been developed.

If you or Mr. Pashia should require copies of any of the information or data discussed above or have any questions related thereto, please contact the undersigned or Mr. J. Mike DiGiglia of our office at your convenience.

Very truly yours,

SCHWAB & WALTER

Gerald L. Walter, JR.

GLWjr

c: Mr. Greg Pashia - EPA Region VI Mr. Louis Smaihall - SBA SBA Customers

Schwab & Walter Attorneys at Law

John Schwab Gerald L. Walter, Jr.

P.002

William E. Hodgkins Anne Jordan Crochet John F. Derenbecker J. Lee Alcock, Jr. Brent B. Boxill 10636 Linkwood Court
Baton Rouge, Louisiana 70810-2854
Telephone (504) 767-1460
Fax (504) 769-0010

Via Facsimile

TO:

Current and Former Customers of SBA Shipyards, Inc.

FROM:

William E. Hodgkins 454

DATE:

May 17, 1996

SUBJECT:

Location of SBA Customers' Meeting

SBA Shipyards, Inc.

Cleanup and Remediation Activities

The May 29, 1996 SBA Customer meeting that has been scheduled to address the pending cleanup and remediation activities will begin at 10:00 a.m. at the Holldome in Lafayette, Louisiana. Upon arriving, please check with the front desk to obtain the room number or name and directions to the room. A map to the Holldome is attached for your convenience.

If coming in on Interstate 10 from the East or the West, simply take Exit 103-A, the Evangeline Throughway, U.S. 90 and La. 167 exit, and travel south on Evangeline Throughway approximately 0.5 miles and turn left at the first exit crossing Evangeline Throughway onto Frontage Road. The Holidome will be on your left.

If coming in from the North on Highway 167, travel south of Interstate 10 on Evangeline Throughway approximately 0.5 miles and turn left at the first exit crossing Evangeline Throughway onto Frontage Road. The Holidome will be on your left.

If coming in from the South on Highway 167, simply turn off at the Holldome when you reach a point that is approximately 0.5 miles South of Interstate 10.

Enclosure:

Map to Lafayette Holldome

c:

Mr. Louis Smaihall - SBA

Schwab & Walter Attorneys at Law

John Schwab Geruld L. Walter, Jr.

William E. Hodgkins Anne Jordan Crochet John F. Derenbecker J. Lee Alcock, Jr. Brent B. Boxtli 10686 Linkwood Court Baton Ronge, Louisiana 70810-2854 Telephone (504) 767-1460 Fax (504) 769-0010

FACSIMILE COVER SHEET

DATE:	5/28/96	PAGE 1	of <u>b</u>	PAGES
TO:	Michael Chernekoff	. 		504-582-8583
	F. William Mahley			
	Tommy Lind			
	Vince Barto			606-329-4412
	Bob Holden			504-556-4108
	William Morelli			615-298-8213
	W. Bruce Law			804-545-5692
	Preston Shuford	, .		409-883-5661
	Allow Tremillor			318-774-3503
	Mary Shaddock Jones		. .	713-888-8422
	Stephen Ortte			
	Don Finoschi			
	Benny Cenac, Jr			
	Dennis Taylor			
	Rich Childers			
	Ed O'Connell			
	Thomas Haines			
	Scott Martin	· • • • • • •		713-461-7319
FROM:	William E. Hodgkins			

PLEASE CONTACT <u>MELISSA</u> AT (504) 767-1460 IF THERE IS ANY PROBLEM WITH THIS TRANSMISSION.

CONFIDENTIALITY NOTICE: This faceimile transmission and/or the documente accompanying it, may contain confidential information belonging to the sender which is protected by the attempty/dient privilege. The information is intended only for the use of the individual or entity named accompany to the testing of any action in relience on the contents of this information is strictly prohibited. If you have received this transmission in error, please immediately notify us by telephone to arrange for the return of the documents.



2) Technology Drive Irvine, Colliarnia 92718 Telephone 714727-9336 Fectimile 714-727-7399

May 28, 1996

Project No. 96-183PR

Mr. Louis Smaihall SBA Shipyards, Inc. 9040 Castex Landing Jennings, Louisiana 70546

> Executive Summary of Trestability Study Results and Preliminary Cost Estimate for Remediation and Closure

Dear Mr. Smaihall:

1.0 INTRODUCTION AND BACKGROUND

- TRC Environmental Solutions, Inc. is pleased to present this summary of Treatability Study results and preliminary remediation and closure cost information for the SBA Shipyards, Inc. site.
- The SBA Shipyards site is located in Jehnings, Louisiana. The site provides barge cleaning services that generate large volumes of water and olly materials.
- Prior to 1990, the wastewater generated by these operations was processed by the use of settling pits. The settling pit process is described as follows:

 - Barge cleaning residuals were pumped into the oily waste pit.

 The water layer was separated from the heavy oily materials (primarily coal tar), which sank to the bottom of the pit.
 - The water layer was transferred from the Oily Waste Pit into Water Pit Number 1.
 - The water separated from Weter Pit Number 1 was transferred to Water Pit Number 2, and then to Water Pit Number 3.
 - The water from Pit 3 was then reused in the pit cleaning operations.
- This process was discontinued and replaced by holding tanks.
- Sludges generated in the water pits were periodically removed and placed in a sludge pit, as shown in Figure 1.
- Based on our review of the data provided to us, the following remediation/closure issues have been identified for the SBA Shipyards site:
 - Pit Materials:
 - The Oil Pit, which contains approximately 3,000 yd3 of coal tar, heavy hydrocarbons and sludge.
 - Water Pit 1, which contains approximately 2,500 yd³ of sludge that has been solidified using lime and fertilizer.
 - Water Pit 2, which contains 300 yd3 untreated sludge.
 - Tank Materials:
 - Approximately 1.1 million gallons of water and hydrocarbon amulsions are stored onsite in tanks and barges.

Mr. Louis Smaihall May 28, 1996 Page 2

- Ground Water:
 - Shallow ground water has been impacted by the pit materials.
 - Some free product has been identified in subsurface investigations.
- 7. Based on the information presented, the pit materials appear to be regulated as RCRA wastes due to exceedances of Toxicity Characteristic Leaching Procedure (TCLP) limits and the potential acceptance of RCRA listed chemical residues. Under RCRA regulations, hydrocarbon materials may be recycled under limited circumstances, as long as the use does not constitute disposal.

2.0 TREATABILITY STUDY RESULTS

- In preparing this proposal, TRC Environmental Solutions, Inc. performed a limited Treatability Study on the oil pit materials to determine if various low-cost remedial alternatives were applicable to the SBA Shippards materials.
- 2. The Treetability Study evaluated the following alternatives:
 - Solidification/stabilization using various oil adsorptive and pozzolanic materials.
 - Recycling:
 - Road mix materials using aggregate and the oily sludges to produce any acceptable road base/road asphalt. This may be prohibited by RCRA regulations.
 - Fuel blending using kerosens or dissel as the dilution solvent to produce a usable fuel product.
 - Coal tar redistillation/recycling using a fractionation process to distill the coal tar products into various commercially usable materials, such as roofing tar and fuels. Current RCRA regulations allow the chemical reprocessing of these types of materials into porregulated raw materials.
- 3. The results of the Treatability Study indicated the following:
 - Solidification/stabilization:
 - The Oil Pit materials solidified/stabilized during the treatability study were evaluated for their physical and chemical properties.
 - Leachability testing of the solidified/stabilized materials prepared in our laboratory using TCLP indicated no organic or inorganic constituents exceeding the EPA TCLP.
 - The solidified/stabilized material had an unconfined compressive strength of greater than 50 psi, and therefore could support a cap as part of site closure.
 - Betimeted costs for solidification/stabilization of the soil pit materials and the remaining only sludges range from \$35 to \$50 per ron.

Mr. Louis Smaihall May 28, 1996 Page 3

- The Pit 1 materials treated with time and fertilizer by SBA Shipperds showed leachable hydrocarbons by TCLP results.
- The Pit 2 materials which have not yet been treated by SBA are expected to respond similarly to the Oil Pit materials.
- The underlying sails were not tested as part of this treatability study, but are assumed to be treatable using the same approach.

Road Mix

- Use of the oil pit materials produced a read type asphalt material, which meets or exceeds the ASTM requirements for slow cure asphalt.
- Estimated costs for road mix production range from \$10 to \$15 per ton.
- Current RCRA regulations prohibit application of RCRA Hazardous Wastes to land. However, this alternative should be further evaluated, as part of the Remedial Action Plant Closure Plan.

· Fuel Blending:

- Dilution of the Oil Pit material (primarily coal tar) with 30 percent diesel or kerosene produced a pumpable material which could be used as a fuel for industrial furnaces or coment kilns.
- The fuel value of the Oil Pit material was approximately 14,000 BTUs/lb. The BTU value for the diluted coal ter as a fuel was 11,000 BTUs/lb.
- Costs are in the range of \$20 to \$30 per ton.

Coal Ter Redistillation/Recycling:

- Fractionation/distillation of the composite pit materials (oil, sludge and paraffin) recovered \$0 to \$5 percent of the hydrocarbon materials.
- Practions collected appear to be marginally acceptable as raw materials for fuels and roof material.
- Costs are in the range of \$30 to \$60 per ton.

Based on the limited information available, the most cost-effective alternative appears to the use of the paraffin and sludge materials in fuel blending.

3.0 REMEDIAL ACTION PLAN/CLOSURE PLAN DEVELOPMENT

- 1. A Remedial Action Plan/Closure Plan must be developed to address the following issues:
 - Remedial actions necessary to treat the pit materials:
 - The need to treat the pit materials will be based on the site hypothesis, the risks presented by the wastes and the potential impacts to ground water.
 - Alternatives which minimize treatment will be evaluated as part of this task, based on the site hypothesis and the ground water conditions.

Mr. Louis Smalhall May 28, 1996 Page 4

- Remedial actions for ground water and free phase product removal:
 - Based on the current data, free product removal is expected to be required, but is not expected to be a costly task.
 - Intrinsic biodegradation will be considered as the primary ground water remedial alternative, given the current regulatory climate and the recent study by the Lawrence Livermore Laboratory on the fate of hydrocarbons in soils and ground water, which strongly indicates that pump and treat options are unnecessary and ineffective for dissolved phase hydrocarbons.
- Site closure activities:
 - Based on the activities indicated above, an overall site Closure Plan
 must be developed to reflect the type of treatment required for the
 pit materials and the type of capping required (if necessary) based
 on the remedial actions, and the level of protection required.
- Remedial action/closure costs and schedule;
 - As part of the Remedial Action Plan/Closure Plan, a detailed cost estimate would be developed. This will include areas where cost growth could be significant.
 - Based on the plan, an optimum schedule would be developed and presented. This schedule would reflect the best use of capital resources and Remedial Action Plan cash flow considerations.
 - Preliminary cost estimates to complete the remedial actions and the closure range from \$650,000 to \$950,000 based on the limited amount of data available. These costs hay change significantly depending on the Final Closure Plan accepted by the agencies, and the results of additional site and ground water investigation activities. These costs do not include long-term operations and maintenance activities.
 - Remedial Action Plan/Closure Flan costs range from \$38,000 to \$56,000.

TRC Environmental Solutions, Inc. appreciates this opportunity to be of service to SBA Shipyards, Inc. Please call us should you have any questions or wish to discuss the information provided herein.

Sincerely.

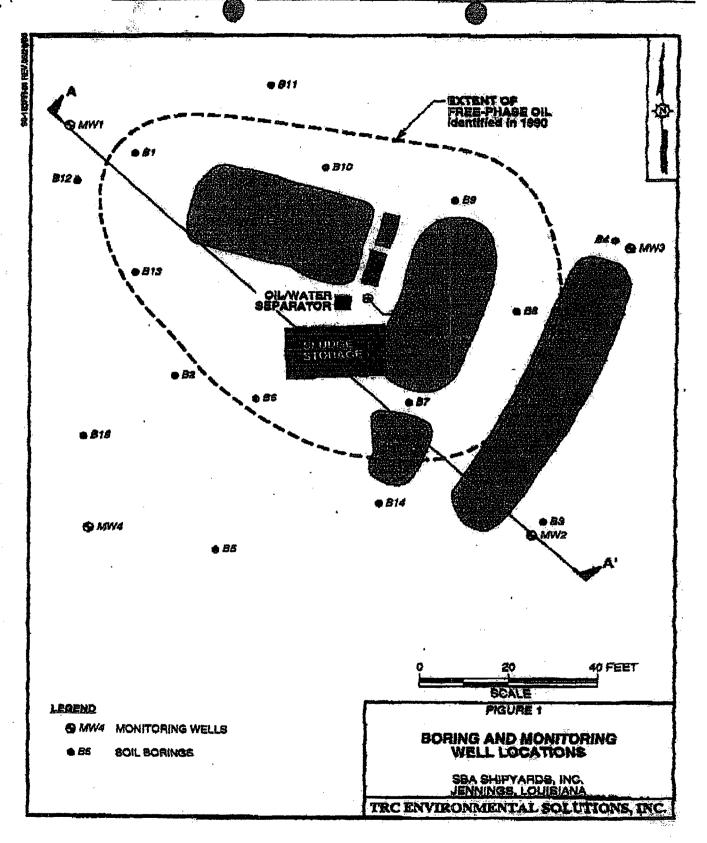
Miro Knezevic

Executive Vice President

MK/DD:pm Enclosure

c: SBA Shipyards, Inc. Customers

Uldeenl





21 Technology Drive Irvine, California 92718 Telephone 714-727-9336 Facsimile 714-727-7399

May 28, 1996

Project No. 96-183PR

Mr. Louis Smaihall SBA Shipyards, Inc. 9040 Castex Landing Jennings, Louisiana 70546

Executive Summary of Treatability Study Results and Preliminary Cost Estimate for Remediation and Closure

Dear Mr. Smaihall:

TRC Environmental Solutions, Inc. is pleased to submit this Executive Summary Proposal to SBA Shipyards and the Potential Responsible Parties. Our understanding of the project and our proposed approach are presented below.

1.0 INTRODUCTION

- 1. The purpose of this proposal is to present our approach to developing a Remedial Action Plan/Closure Plan for the SBA Shipyards site.
- This proposal outlines the remedial approaches available to address the pit materials, sludges, tank materials and ground water, and presents potential remedial cost ranges for the various approaches.

2.0 BACKGROUND

- 1. The SBA Shipyards site is located in Jennings, Louisiana. The site provides barge cleaning services that generate large volumes of water and oily materials.
- 2. Prior to 1990, the wastewater generated by these operations was processed by the use of settling pits. The settling pit process is described as follows:
 - Barge cleaning residuals were pumped into the oily waste pit.
 - The water layer was separated from the heavy oily materials (primarily coal tar), which sank to the bottom of the pit
 - (primarily coal tar), which sank to the bottom of the pit.
 The water layer was transferred from the Oily Waste Pit into Water Pit Number 1.
 - The water separated from Water Pit Number 1 was transferred to Water Pit Number 2, and then to Water Pit Number 3.
 - The water from Pit 3 was then reused in the pit cleaning operations.
- 3. This process was discontinued and replaced by holding tanks.
- 4. Sludges generated in the water pits were periodically removed and placed in a sludge pit, as shown in Figure 1.

Mr. Louis Smaihall May 28, 1996 Page 2

- 5. Based on our review of the data provided to us, the following remediation/closure issues have been identified for the SBA Shipyards site:
 - Pit Materials:
 - The Oil Pit, which contains approximately 3,000 yd³ of coal tar, heavy hydrocarbons and sludge.
 - Water Pit 1, which contains approximately 2,500 yd³ of sludge that has been solidified using lime and fertilizer.
 - Water Pit 2, which contains 300 yd³ untreated sludge.
 - Tank Materials:
 - Approximately 1.1 million gallons of water and hydrocarbon emulsions are stored onsite in tanks and barges.
 - Ground Water:
 - Shallow ground water has been impacted by the pit materials.
 - Some free product has been identified in subsurface investigations.
- 6. Based on the information presented, the pit materials appear to be regulated as RCRA wastes due to exceedances of Toxicity Characteristic Leaching Procedure (TCLP) limits and the potential acceptance of RCRA listed chemical residues. Under RCRA regulations, hydrocarbon materials may be recycled under limited circumstances, as long as the use does not constitute disposal.

3.0 TREATABILITY STUDY RESULTS

- 1. In preparing this proposal, TRC Environmental Solutions, Inc. performed a limited Treatability Study on the oil pit materials to determine if various low-cost remedial alternatives were applicable to the SBA Shipyards materials.
- 2. The Treatability Study evaluated the following alternatives:
 - Solidification/stabilization using various oil adsorptive and pozzolanic materials.
 - Recycling:
 - Road mix materials using aggregate and the oily sludges to produce any acceptable road base/road asphalt. This may be prohibited by RCRA regulations.
 - Fuel blending using kerosene or diesel as the dilution solvent to produce a usable fuel product.
 - Coal tar redistillation/recycling using a fractionation process to distill the coal tar products into various commercially usable materials, such as roofing tar and fuels. Current RCRA regulations allow the chemical reprocessing of these types of materials into nonregulated raw materials.

Mr. Louis Smaihall May 28, 1996 Page 3

3. The results of the Treatability Study indicated the following:

Solidification/stabilization:

- The Oil Pit materials solidified/stabilized during the treatability study were evaluated for their physical and chemical properties.
- Leachability testing of the solidified/stabilized materials prepared in our laboratory using TCLP indicated no organic or inorganic constituents exceeding the EPA TCLP.
- The solidified/stabilized material had an unconfined compressive strength of greater than 50 psi, and therefore could support a cap as part of site closure.
- Estimated costs for solidification/stabilization of the soil pit materials and the remaining oily sludges range from \$35 to \$50 per ton.
- The Pit 1 materials treated with lime and fertilizer by SBA Shipyards showed leachable hydrocarbons by TCLP testing.
- The Pit 2 materials which have not yet been treated by SBA are expected to respond similarly to the Oil Pit materials.
- The underlying soils were not tested as part of this treatability study, but are assumed to be treatable using the same approach.

Road Mix:

- Use of the oil pit materials produced a road type asphalt material, which meets or exceeds the ASTM requirements for slow cure asphalt.
- Estimated costs for road mix production range from \$10 to \$15 per ton.
- Current RCRA regulations prohibit application of RCRA Hazardous Wastes to land. However, this alternative should be further evaluated, as part of the Remedial Action Plan/Closure Plan.

• Fuel Blending:

- Dilution of the Oil Pit material (primarily coal tar) with 30 percent diesel or kerosene produced a pumpable material which could be used as a fuel for industrial furnaces or cement kilns.
- The fuel value of the Oil Pit material was approximately 14,000 BTUs/lb. The BTU value for the diluted coal tar as a fuel was 11,000 BTUs/lb.
- Costs are in the range of \$20 to \$30 per ton.

Coal Tar Redistillation/Recycling:

- Fractionation/distillation of the composite pit materials (oil, sludge and paraffin) recovered 80 to 85 percent of the hydrocarbon materials.
- Fractions collected appear to be marginally acceptable as raw materials for fuels and roof material.
- Costs are in the range of \$30 to \$60 per ton.

Mr. Louis Smaihall May 28, 1996 Page 4

4.0 SCOPE OF WORK

1. The proposed scope of work, for the preparation of the overall Remedial Action Plan/Closure Plan is presented below on a task-by-task basis.

TASK 1 - REVIEW OF SITE DATA/SITE HYPOTHESIS

- 1. The initial task will be to collect the available site data and complete a review of this information. As part of this review, data gaps will be identified. After the review is completed, a site hypothesis will be developed, to explain the relationship of the waste pits, ground water, and the site risks. By developing a site hypothesis early, the appropriate resources can be applied to the issues which have the greatest potential cost implications, such as ground water restoration.
- 2. After formulation of the site hypothesis and the identification of data gaps, the need for additional site investigation activities will be evaluated. This evaluation will be based on the cost and need for the additional data to complete the Remedial Alternative Evaluation or Closure Plan decisions. Our evaluation of the current ground water data indicates that the wells are screened well below the surface of the water table, and therefore may not have captured the lighter hydrocarbons. However, the denser hydrocarbons such as coal tar may still be captured. Currently, at least one additional ground water well is proposed near the center of the pits to further delineate ground water and free phase product conditions (Figure 1). Based on the laboratory results from samples taken from this well, additional ground water data may be needed.

TASK 2 - REMEDY/CLOSURE ALTERNATIVE EVALUATION

- After completion of the site hypothesis, the various remedial closure options will be further evaluated to determine their applicability, regulatory issues, implementability and cost. This step is critical in developing a long-term closure plan that optimizes the overall program so that the most cost-effective alternative, which is protective to health and the environment, is selected.
- 2. As part of this task, additional treatability work may be necessary to refine the remedial alternatives. However, this will likely be performed by the technology vendors, which will reduce the overall cost of any additional studies.

TASK 3 - REMEDIAL ACTION PLAN/CLOSURE PLAN DEVELOPMENT

- 1. Based on the results of Tasks 1 and 2, a Remedial Action Plan/Closure Plan will be developed. The plan will address the following issues:
 - Remedial actions necessary to treat the pit materials:
 - The need to treat the pit materials will be based on the site hypothesis, the risks presented by the wastes and the potential impacts to ground water.
 - Alternatives which minimize treatment will be evaluated as part of this task, based on the site hypothesis and the ground water conditions.



Mr. Louis Smaihall May 28, 1996 Page 5

- Remedial actions for ground water and free phase product removal:
 - Based on the current data, free product removal is expected to be required, but is not expected to be a costly task.
 - Intrinsic biodegradation will be considered as the primary ground water remedial alternative, given the current regulatory climate and the recent study by the Lawrence Livermore Laboratory on the fate of hydrocarbons in soils and ground water, which strongly indicates that pump and treat options are unnecessary and ineffective for dissolved phase hydrocarbons.
- Site closure activities:
 - Based on the activities indicated above, an overall site Closure Plan will be developed.
 - The Closure Plan will reflect the type of treatment required for the pit materials and the type of capping required (if necessary) based on the remedial actions, and the level of protection required.
- Remedial action/closure costs and schedule:
 - As part of the Remedial Action Plan/Closure Plan, a detailed cost estimate will be developed. This will include areas where cost growth could be significant. This will also be helpful during agency negotiations in Task 4.
 - Based on the plan, an optimum schedule will be developed and presented. This schedule will reflect the best use of capital resources and Remedial Action Plan cash flow considerations.
 - Preliminary cost estimates to complete the remedial actions and the closure range from \$650,000 to \$950,000 based on the limited amount of data available. These costs may change significantly depending on the Final Closure Plan accepted by the agencies, and the results of additional site and ground water investigation activities. These costs do not include long-term operations and maintenance activities.
 - Remedial Action Plan/Closure Plan costs range from \$38,000 to \$56,000.

TASK 4 - REMEDIAL ACTION PLAN/CLOSURE PLAN NEGOTIATION

After development and submission of the Remedial Action Plan/Closure Plan to the
regulatory agencies, negotiations will likely be necessary to resolve issues developed by
the regulatory agencies. This may be a minor task, or a significant task depending on
the agency responses.

TASK 5 - IMPLEMENTATION OF THE REMEDIAL ACTION PLAN/CLOSURE PLAN

1. Based on the results of the negotiations with the agency, the agreed-on plan will be implemented.

Mr. Louis Smaihall May 28, 1996 Page 6

5.0 COSTS AND SCHEDULE

- 1. The cost for Task 1 through 4 are shown in Table 1.
- 2. Work would be performed on a time and materials basis according to our current schedule of charges (provided in Appendix A). Invoices would be issued monthly and billing terms are net 30 days.
- 3. No additional work to that proposed herein would be initiated without prior authorization.
- 4. Based on the information provided to date and the proposed scope of work, Tasks 1 through 3 will require approximately 8 to 10 weeks to complete. Task 4 will be implemented, as necessary, based on the comments from the regulatory agencies.

6.0 CLOSING REMARKS

Sincerely,

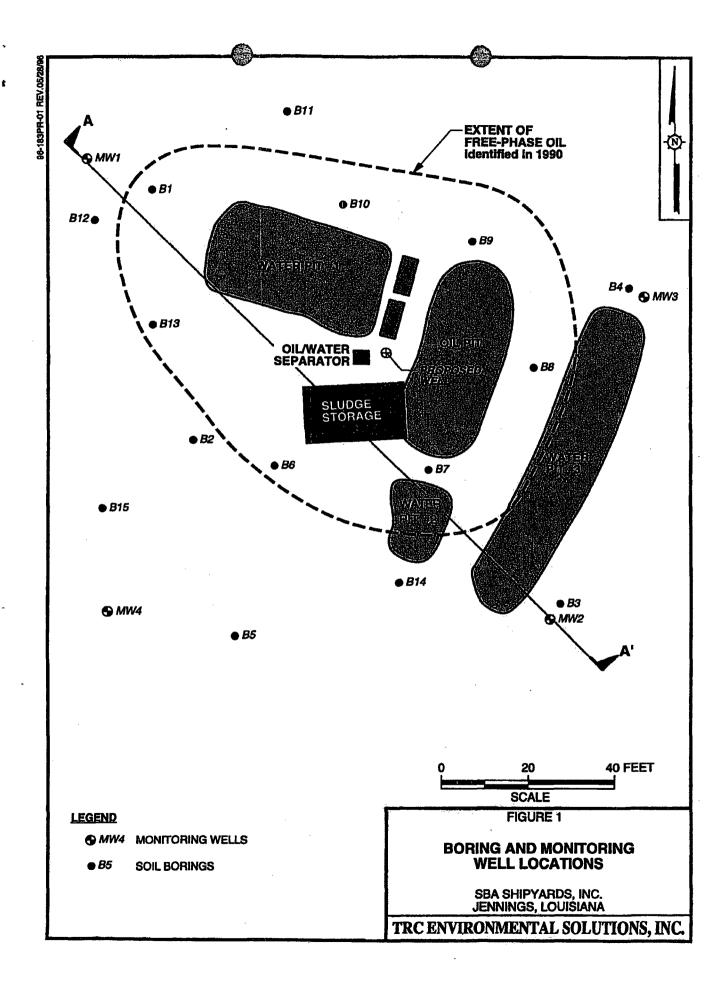
TRC Environmental Solutions, Inc. appreciates this opportunity to be of service for
work required at the SBA Shipyards site. We are prepared to begin work upon receipt
of authorization to proceed, which may be indicated by signing and returning one copy
of this proposal to us. Should you have any questions regarding this proposal,
please call us.

Miro Knezevic
Executive Vice President
MK/DD:pm Enclosure
cc: SBA Shipyards, Inc. Customers
ACCEPTED: SBA SHIPYARDS, INC.
Ву:
Dated:
Purchase Order No.:

Table 1 Estimated Costs

TASK	COST ESTIMATE (\$)
Task 1: Review of Site Data/Site Hypothesis	9,000 - 14,000
Task 2: Remedy/Closure Alternative Evaluation	4,000 - 6,000
Task 3: RAP/Closure Plan Development	16,000 - 22,000
Task 4: Agency Presentation/Negotiations	3,000 - 5,000
Subtotal	32,000 - 47,000
Contingency (20%)	6,400 - 9,400
TOTAL	38,400 - 56,400

96-183PR (5/22/96/rmm)



PROPOSED AGENDA

MEETING OF SBA SHIPYARD, INC.'S CUSTOMERS PERTAINING TO THE ENVIRONMENTAL REMEDIATION AT SBA

1-36 - 3501C

MAY 29, 1996

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1.				C.		

♦ Representatives of SBA Shipyards, inc. ♦ Representatives of TRC Environmental Solutions, Inc. NATURE AND SCOPE OF KNOWN ENVIRONMENTAL PROBLEMS II.

- ◆ Tanks and Converted Barges
- ◆ Surface Impoundments
- ◆ Land Treatment Area
- Groundwater

III. **REVIEW OF TREATABILITY STUDY AND COST ESTIMATES**

- ◆ Treatability Study
 - ➤ Relevant Chemical and Physical Parameters Encountered/Considered
 - ➤ Technology Options Considered/Tested
 - Surface Impoundments
 - ◆ Tank Contents
 - ➤ Results and Conclusions
- ◆ Remediation and Closure Cost Estimates
 - ➤ Preparation of Closure Plan
 - > Preparation of Phased Hydrocarbon Removal and Groundwater Remediation Plan
 - ➤ Surface Impoundment/Land Treatment Unit Closure
 - ➤ Tank Closure
 - ➤ Free-Phase Hydrocarbon Layer Recovery
 - ➤ Groundwater Pumping, Treatment and Monitoring
 - ➤ Time Tables for Completion

IV. **ALLOCATION OF LIABILITY/COSTS**

- Number of Barges Cleaned
- Volumes of Material Removed From Each Barge
- ◆ Nature of Material Removed From Each Barge
- ◆ Information regarding SBA

V. PROJECT AND FUND MANAGEMENT

- ◆Consideration of Formation of Legal Entity Owned by Each Party Participating in Cleanup Proportionate to Agreed Upon Participation.
- ◆ Board Members and Officers of Legal Entity
- Selection of Closure and Remediation Contractor(s)
- On-Site Management of Closure and Remediation Activities

VI. VISIT TO SBA SHIPYARDS, INC.'S FACILITY

HOW can everyone be assured EPA/DEQ approved estacioitica and encyled Iliu a colores mort esceler of ton Iliw yant

SBA SHIPYARDS, INC.

CUSTOMER INFORMATION RELATING TO HISTORICAL BARGE CLEANING ACTIVITIES (Revised May 28, 1996)

BARGE COMPANY/OWNER	DATE RANGE	NUMBER OF VESSELS CLEANED	PREVIOUS CARGOES
National Marine Service P.O. Box 52189 New Orleans, LA 70512 Contact: Mark East Phone: (504) 529-8663 ATTORNEY: Michael A. Chernekoff Jones, Walker 201 St. Charles Ave. New Orleans, LA 70170 (ph) 504-582-8264 (fx) 504-582-8583	8/77 - 3/94	93	Asphalt, Creosote (U051), p-Xylene (U239), Styrene, Vinyl acetate, carbon tetrachloride (U211), methanol (U154), coal tar, gasoline, creosote-type black oil, carbon black, ethyl acrylate (U113), acrylates, heavy slop oil, corn oil, diesel oil, black liquor, No. 6 oil, crude oil, coal tar distillate
Sabine Towing Company P. O. Box 1528 Groves, TX 77619 Contact: Dennis Buffo Phone: (409) 962-0201 ATTORNEY: F. William Mahley Griggs & Harrison, P.C. 1301 McKinney, Ste. 3200 Houston, TX 77010 (ph) 713-651-0600 (fx) 713-651-1944	3/82 - 10/88	9	Crude Oil, Jet Fuel, No. 6 Fuel, Condensate
Canal Barge Company 835 Union Street New Orleans, LA 70112 Contact: Tommy Lind (ph) 504-581-2424 (fx) 504-584-1588	5/89 - 10/89	2	Coal Tar, Cylinder Oil
Ashland Oil Company P. O. Box 391 Ashland, KY 41114 Contact: Vince Barto (ph) 606-329-4707 (fx) 606-329-4412	1/87 - 1/95	15	Crude Oil, Coal Tar, Cumene (U055), Lube Oil, Asphalt Slops, Coke Oven Tar, Black Oil, Asphalt, No. 6 Asphalt, Recycled Crude, Vacuum Tower Bottoms, Charge Stock

BARGE COMPANY/OWNER	DATE RANGE	NUMBER OF VESSELS CLEANED	PREVIOUS CARGOES	
Ingram Barge Lines P. O. Box 23049 Nashville, TN 37020 Contact: Bill Morelli Phone: (615) 298-8200/8244 ATTORNEY: Mr. Bob Holden Liskow & Lewis 701 Poydras St., Ste. 5000 New Orleans, LA 70139 (ph) 504-556-4130 (fx) 504-556-4108	1/87 - 11/93	9	Crude, No. 6 Oil, Coal Tar, Slop #6 Oil, Creosote (U051), Heavy Aromatics/Gasoline, Crude Oil	
Allied Towing P. O. Box 717 Norfolk, VA 23501 Contact: W. Bruce Law (ph) 804-545-7301 (fx) 804-545-5692	8/85 - 8/86	1	Asphalt, Bunker C, Caustic Soda	
Transerve Marine P. O. Box 717 Norfolk, VA 23501 Contact: W. Bruce Law Phone: (804) 545-7301 (fx) 804-545-5692	11/84 - 4/90	11	Caustic Soda, Tallow, Lube Oil, Corn Oil, UREA-Ammonium Nitrate, Soybean	
Higman Towing Company P. O. Box 908 Orange, TX 77631 Contact: Preston Shuford Phone: (409) 883-5636 (fx) 409-883-5661	2/90 - 3/95	15	Crude Oil, No. 6 Oil, Kerosene	
Tallen Marine P. O. Box 1040 Lake Arthur, LA 70549 Contact: Duke Gremillion Phone: (318) 774-5480 (fx) 318-774-3503	8/90 - 6/95	8	Diesel, Water	
Hollywood Marine P. O. Box 1343 Houston, TX 77251 Contact: Mary Shaddock Jones Phone: (713) 868-1661 (fx) 713-868-6422	10/87 - 6/90	4	Crude Oil, No. 6 Oil, Bunker Oil, Black Oil	
Marine Operators, Inc. P. O. Box 51694 Lafayette, LA 70505 Contact: Stephen Ortte Phone: (318) 232-9248 (fx) 318-232-9043	11/85	0	Diesel Oil	

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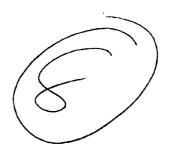
BARGE COMPANY/OWNER	DATE RANGE	NUMBER OF VESSELS CLEANED	PREVIOUS CARGOES
Sargent Marine 868 Marian Road Woodbury, NJ 08096 Contact: Dan Finocchi Phone: (609) 848-0535 (fx) 305-753-6603	3/95	1	Asphalt
Cenac Towing Company P. O. Box 2617 Houma, LA 70361 Contact: Benny Cenac, Jr. Phone: (504) 872-2413 (fx) 504-851-1761	11/88 - 5/95	31	No. 6 Oil, Crude Oil, Condensate, Slop Oil, Asphalt, Lube Oil, Waste Water, Drill Water, Crude Distillate, Carbon Oil
Leevac/Domar Marine P. O. Box 2528 Morgan City, LA 70381 Contact: Dennis Taylor Phone: (504) 384-8000 (fx) 504-384-4240	12/84 - 7/88	4	Black Oil, Crude Oil, No. 6 Oil, Gasoline, Diesel
L & L Oil Company P. O. Box 6984 Metairie, LA 70009 Contact: Richard Childers Phone: (504) 832-8600 (fx) 504-832-8625	10/94	1	Diesel
Beazer-East, Inc. (Formerly Koppers Company) 436 7th Avenue Pittsburg, PA 15219 Contact: Ed O'Connell Phone: (412) 227-2389 (fx) 412-227-2042	5/86 - 7/86	2	Coal tar
Martin Gas Marine 8582 Katy Freeway, #112 Houston, TX 77024 Contact: Scott Martin Phone: (713) 461-0606 (fx) 713-461-7319	12/91	1	Gas, Oil
Sun Oil Company 1801 Market Street Philadelphia, PA 19103 Contact: Thomas Haines, Esq. Phone: (215) 977-6273 (fx) 215-977-6878	1/89	1	Asphalt, Crude

TOTAL NO. OF BARGES 208

SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS **VESSEL NUMBER PREVIOUS 3 CARGOES COMPANY** DATE(S)* WORK ORDER NO. ADDITIONAL INFO. Tallen Marine 8/29/90 T-13 Diesel (3x) 1179 Washed tanks of diesel oil 9/19/90 Glenn C Diesel (3x) 1182 Washed tanks of diesel oil 6/19/91 T-13 Diesel Fuel (3x) 1216 Fuel oil T-13 6/26/92 Diesel 1254 Fuel oil Diesel, Water 8/3/93 Rig Runner 1285 Fuel oil approx. 1 3/4 bbls. 9/23/93 T-13 Diesel Fuel (3x) 1289 6 cargo tanks fuel oil & rust 10/31/94 T-13 Diesel (3x) 1339 Stripped tanks of fuel residue 6/9/95 Glenn C Diesel Fuel (3x) 1358 Cleaned 4 main cargo tanks, sludge

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 8

* - Based on date from Marine Chemist's Gas Free Certificate



SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS						
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.	
Canal Barge Company	5/17/89	CBC-137	Coal Tar, Creosote	1121	128 BBLS creosote and coal tar removed from wings and voids	
	10/25/89	CBC-231	Coal Tar (3)	1138	1804 bbls approx. coal tar, waste oil and B.S. & W. from tank bottoms	

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 2

* - Based on date from Marine Chemist's Gas Free Certificate

SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS **VESSEL NUMBER PREVIOUS 3 CARGOES** WORK ORDER NO. COMPANY DATE(S)* ADDITIONAL INFO. 3/11/82 ST-123 Crude Oil 653 No additional information Sabine Towing 4/8/85 STC0-228 NO. 6 oil 892 21,000 bbl barge; 60 bbls 6-oil & rust removed 6/1/86 STCO-219 crude oil 968 60 bbls crude & wax removed out of 10 cargo tanks STCO-224 20 bbls of 6-oil and crude oil 6/2/86 No. 6 oil; crude oil 969 removed * 23,000 bbl barge; removed approx. 5/23/88 STCO-230 No. 6 Fuel 1044 60 bbls boiler fuel bunker c. 9/22/88 STCO-221 Condensate/Crude Oil 1090 picked up approx. 25 bbis of condensate and crude oil Picked up approx. 30 bbls of crude 10/6/88 STCO-220 Crude Oil (3) 1091 oil and paraffin 1/7/89 TBC-2 Water and heavy tank 1109 Pumped to pits approx. 6,000 bbls of water and heavy-tank-bottoms bottoms 4/1/89 STCO-227 45 bbjs crude oil removed. crude oil 963

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 9

	PROBA	BLE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY P	PRESENT IN TANKS AN	D PITS
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Ingram Barge Lines	1/9/87	I-B 7027	Crude	994	Arrived Pre-Cleaned
	3/5/88	TB-911		1035	Stripped cargo tanks approx. 15 bbis.
	3/5/88	WTB-806		1035	Stripped cargo tanks approx. 15 bbls.
	3/16/88	George	#6 Oil/Coal Tar	1033	10 cargo tanks; bucketed out approx. 20 bbls black & carbon oils
	3/30/88	Hollywood 2102	Slop #6 Oil	1037	cleaned out slop oil; #6 oil & B.S. & W.
	5/2/88	Hollywood 2523	Slop Oil	1041	Approx. 260 bbls of sludge, wax and B.S. & W.
	10/10/88	IB-1302	Coal Tar (3)	1088	Approx. 600 bbls creosote & coal tar removed.
	1/25/89	IB-1308	Heavy Aromatics/Gasoline	1110	approx. 60 bbls of product removed
	8/5/90	I-B 908	Wastewaver	1178	Barge already gas free. Just pumped water from tank barge
	10/5/90	I-B 1926	Ethonol	1185	Approx. 18 bbls of product removed/striped tanks with vacuum truck
	11/8/93	IB-2710	Crude Oil	1296	Arrived Pre-Cleaned

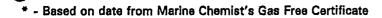
^{# -} Based on date from Marine Chemist's Gas Free Certificate

SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS COMPANY DATE(S)* **VESSEL NUMBER** PREVIOUS 3 CARGOES ADDITIONAL INFO. WORK ORDER NO. Hollywood 2802 **Hollywood Marine** Crude Oil, No. 6 Oil Cleaned barge 10/17/87 1021 11/17/87 Hollywood 1401 Bunker Oil (No. 6) 1013 Cleaned barge Hollywood 2511 Light Crude Oil 14 tanks cleaned light crude oil 3/3/90 1153 8/1/90 Hollywood 2513 Black Oil, Crude Oil 20,000 bbl barge; 55 bbls contain 1166 rust, scale, and crude oil

TOTAL BARGES CLEANED FOR THIS CUSTOMER = A

Α.	SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS									
COMPANY	COMPANY DATE(S) VESSEL NUMBER PREVIOUS 3 CARGOES WORK ORDER NO. ADDITIONAL INFO.									
Marine Operators	11/15/85	MOP 190	Diesel Oil	921	Arrived Pre-Cleaned					

SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS									
COMPANY	ADDITIONAL INFO.								
Sergeant Marine	3/13/95	MC Asphalt 201	Asphalt (x3)	1342	Removed approx. 156 bbls of asphalt, rust and scale.				



SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS									
COMPANY	DATE(S).	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.				
Allied Towing	8/21/85	Kelly	Asphalt, Bunker C	911	Removed asphalt and bunker C.				
	4/21/86	Kelly	Asphalt	964	Arrived Pre-Cleaned				
	8/1/86	I-150	Caustic Soda	978	Arrived Pre-Cleaned				

^{* -} Based on date from Marine Chemist's Gas Free Certificate

	SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS										
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.						
Higman Towing Company	10/2/88	HTCO-S-2013	crude oil	1092	25,000 bbl barge; bottoms contained crude oil						
	12/3/88	HTCO-2026	crude oil	1102	25,000 bbl barge; bottoms contained crude oil						
•	6/5/89	HTCO-2027	crude oil	1125	25,000 bbl barge; contained crude oil bottoms						
	9/1/89	HTCO-2028	crude oil	1132	25,000 bbl barge; contained crude oil bottoms						
	11/5/89	HTCO-S-2512	crude oil	1139	25,000 bbl barge; contained crude oil bottoms						
	3/2/90	HTCO-S-2020	crude oil	1156	25,000 bbl barge; contained crude oif bottoms						
	3/3/91	HTCO-DXE-2302	crude oil	1202	25,000 bbl barge; contained crude oil bottoms						
· · · · · · · · · · · · · · · · · · ·	4/8/91	HTCO-1802	Crude Oil (3x)	1206	Arrived Pre-Cleaned						
	12/16/92	HTCO-2021	Crude Oil	1263	10 cargo tanks approx. 86 bbl heavy product and paraffin wax						
	6/24/93	HTCO-2024	Crude Oil (3x)	1282	10 cargo tanks approx. 86 bbl heavy product and paraffin wax						
	1/11/94	HTCO-2514	No. 6 Oil	1301	Approx. 90 bbls of B.S. & W. crude oil bottoms removed						
	4/28/94	HTCO-2513	Crude Oil (3x)	1308	6-oil mix with sand to oil pit						

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SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS									
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.				
Higman Towing Company	7/6/94	HTCO-3001	Kerosene, Crude Oil, Crude Oil	1322	Crude dil bottoms removed				
<i>></i>	7/6/95	HTCO-S-2014	crude oil	1362	Crude oil bottoms removed				
	12/1/95	HTCO-S-2011	crude oil	1374	Crude oil:bottoms removed				
	3/1/95	HTCO-3001	Crude Oil (x3)	1346	crude oil and B.S. & W. removed				

	SBA SHIPYAROS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS										
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.						
Transerve Marine	11/6/84	Ryan	Caustic Soda	1007	Arrived Pre-Cleaned						
	1/20/85	ATC 586	Caustic Soda, Tallow	955	removed 55 gal of waste oil; also cleaned 7 main cargo tanks of tallow and caustic soda						
e e e e e e e e e e e e e e e e e e e	3/21/85	1-50	Lube Oil	887	Removed lube oil						
		I-50		878	Arrived Pre-Cleaned						
	11/13/85	Ryan	Caustic Soda	920	Removed heavy deposits of caustic						
	7/21/86	Hooker Burlington	Caustic Soda	975	Arrived Pre-Cleaned						
	11/17/86	I-5O	Caustic Soda	978	Removed caustic						
	4/21/87	I-50	Corn Oil, Caustic Soda	1003	Removed caustic and corn oil						
	12/17/86	I-50	Caustic soda	989	Removed caustic and silt						
	5/26/87	Ryan	Caustic Soda	1007	Arrived Pre-Cleaned						
	1/11/88	1-50	Caustic Oil/Caustic	881	Removed caustic						
	3/27/89	TMI-91	Caustic Soda (3)	1119	Cleaned out caustic, mud and rust						
	8/9/89	TMI-96	UREA-Ammonium Nitrate	1130	Arrived Pre-Cleaned						
	12/4/89	I-50	Soybean & Corn Oil/Caustic Soda	1145	Removed caustic and corn oil						
	12/13/89	1-50	Corn Oil, Soybean Oil	1145	Approx. 200 bbl of caustic soda and corn oil removed						
	4/12/90	1-50	Caustic Soda	1161	cleaned caustic barge for hotwork						

^{* -} Based on date from Marine Chemist's Gas Free Certificate

COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.		
Ashland Oil Company	1/16/87	T-1701	Crude Oil	995	Arrived Pre-Cleaned		
	3/30/87	HBL-3011	Coal Tar	999	Arrived Pre-Cleaned		
	1/26/88	AO-331	Cumene	1029	Arrived Pre-Cleaned		
	6/8/88	AOC-216	Asphalt Slops	1045	Removed approx. 400 bbls of hard asphalt; solids disposed off-site		
	9/1/88	HTCO-S-2014	Crude Oil	1086	25,000 bbl barge; bottoms contained crude oll; solids disposed off-site		
	5/22/89	AO-36	Coal Tar (3)	1118	removed approx. 280 bbls of coal tar; solids disposed off-site		
	8/3/89	. АО-97	Coke Oven Tar (3)	1126	Heavy asphalt bottoms and B.S. & W. removed; solids disposed off-		
	1/28/92	AOC-216	Black Oil	1227	removed 88 bbls of black oil and slop oil; sollds disposed off-site		
	8/31/92 ·	AOC-253	Asphalt	1255	removed approx. 1172 bbls sludge, 6-oil and asphalt; solids disposed off-site		
	1/25/93	AO-33	Coal Tar, Black Oil	1265	Removed approx. 1460 bbls of 6-oil and asphalt; solids disposed off-site		
	3/16/93	AO-5233	No. 6 Oil, Asphalt	1270	Approx. 1652.5 bbls hard asphalt & 6-oil removed; solids disposed off-site		
,	7/9/94	AOC 236	Coal Tar (3x)	1319	Approx. 485 bbls of coal tar and asphalt removed. Disposed at BFi.		

	SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS										
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.						
Ashland Oil Company	9/1/94	AO-38	Coal tar, asphalt, No. 6 Oil	1320	Approx. 2126 bbls of coal tar, 6-oil, and asphalt removed. Disposed at BFI.						
	11/8/94	AO-36	Black Oil	1332	approx. 2180 bbls hard asphalt and coal tar removed. Disposed at BFI						
	1/17/95	AO-27	Recycled Crude, Vacuum Tower Bottoms, Charge Stock	1333	Approx. 2221 bbls of hard asphalt and coal tar. Disposed at BFI.						
	6/1/95	AO-B244	Asphalt, coal tar, No. 6 Oil	1344	Hard asphalt, coal tar, and 6-oil removed. Disposed at BFI.						
	6/3/95	AO-35		1355	Removed approx. 360 bbls of hard/soft products. Disposed at BFI.						
	7/8/95	AOC-253	Asphalt, Coal Tar	1361	Removed approx. 720 bbls of asphalt and coal tar (hard). Disposed at BFI.						
	9/2/95	HBL-3009		1366	Arrived Pre-Cleaned						

^{* -} Based on date from Marine Chemist's Gas Free Certificate

SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS										
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.					
Sun Oil Company Sun Marine Terminal P.O. Box 758 Nederland, TX 77627	1/4/89	Lou IV	Asphalt, Crude	1104	Removed asphalt products					

COMPANY	, DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.			
Cenac Towing Company	11/14/88	CTCO 181	#6 Oil, Crude, Condensate	1094	Last cargo 6-oil and crude oil			
•• <i>•</i>	5/8/89	CTCO-186	Condensate	1122	Stripped condensate from tanks			
	9/11/90	CTCO 153	Crude Oil	1180	Cleaned out paraffin off of crude of			
	6/4/90	CTCO-188-12	Condensate	1170	Stripped barge of condensate approx. 3 bbis vacuum trucks			
	6/4/90	CTCO-189-12	Condensate	1170	Stripped barge of condensate approx. 3 bbls vacuum trucks			
	2/1/91	CTCO-175	Crude Oil	1198	Removed approx. 60 bbls paraffin wax off of crude oil			
	10/18/91	CTCO 3022	Crude Oil (3x)	1222	Arrived Pre-Cleaned			
	12/31/91	CTCO 154	Slop Oil	1226	Approx. 16 bbls of 6-oil and crude oil removed.			
·	2/7/92	CTCO 2312	Crude Oil (3x)	1230	Arrived Pre-Cleaned			
	4/5/92	CTCO-2304	·	1240	Arrived Pre-Cleaned			
i.	5/3/92	CTCO-175		1248	Removed 10 bbls scale, wax & grease			
	2/20/92	HBL 3006	Asphalt (3x)	1234	Approx. 12' in #1 port and #2 STB of asphalt			
	4/13/92	CTCO 2303	Crude Oil (3x)	1246	Arrived Pre-Cleaned			
	5/22/92	CTCO 2311	Crude Oil	1252	Arrived Pre-Cleaned			
!	8/17/92	CTCO 3005	Asphalt, #6	1256	removed approx. 38 bbls 6-oil, asphalt & rust			

COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER	ADDITIONAL INFO.
				NO.	
Cenac Towing Company	9/4/92	CTCO 1183	Lube Oil	1257	removed approx. 18 bbls B. S. & W.
•	11/6/92	CTCO 3003	No. 6 Oil	1262	Removed approx. 168 bbls of rust asphalt & 6-oil
	1/5/93	CTCO 186-20	Crude Oil	1271	Arrived Pre-Cleaned
	4/5/93	CTCO 3007	Heavy Slop Oil	1273	Removed approx. 201 bbls of asphalt, rust & 6-oil
	6/11/93	CTCO 181	Waste Water, Drill Water	1280	removed approx. 12 bbls of scale and B.S. & W.
	7/15/93	CTCO 196-20	Crude Distillate	1283	Cleaned for shange of calgo crud oil to diesel
	7/28/93	CTCO 196-26	Waste Water	1284	Cleaned sewage barge rust and scale
	10/15/93	CTCO 3025	Carbon Oil	1292	Cleaned approx. 130 bbls carbor oil
	9/6/93	CTCO-2001	Light Oil	1290	Stripped vessel for change of care
	9/6/93	CTCO 2002	Light Oil	1290	Stripped vessel for change of care
Tangu ta wasan w	10/5/93	CTOC-197	Light Oll	1293	Stripped light products from barg approx. 76 bbls.
	10/5/93	CTCO-198	Light Oil	1293	Stripped light-products from barg approx. 76 bbls.
	10/27/93	CTCO 179	Crude Oil	1295	Arrived Pre-Cleaned

	PROBABLE		BA SHIPYARDS, INC. MINANTS CURRENTLY PRES	ENT IN TANKS AN	D PITS
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Cenac Towing Company	3/7/94	CTCO 2003	Condensate, Crude Oil, No. 6 Oil	2736	No additional information
	10/4/94	CTCO-198	Crude oil, No. 6 oil	1338	Removed approx. 24 bbls heavy crude and 6-oil
	5/17/94	CTCO 3025	Carbon Oil, Crude Oil	1311	Removed approx. 48 bbls product
	8/9/94	CTCO 3022	Crude Oil	1326	Approx. 25 bbls of product removed
	8/16/94	CTCO 1524b	Crude Oil	1327	Removed approx. 30 bbls product
·	8/24/94	CTCO 1526b	Crude Oil 3x	1328	Heavy crude oil approx. 90 bbls removed
	5/1/95	CTCO 230	Crude Oil (3x)	1353	Removed approx. 38 bbls heavy grease and paraffin wax
	7/9/95	CTCO-194	Crude Oil	1363	Removed approx. 46 bbls of rust, paraffin & crude oil
	8/1/95	CTCO-195	Crude Oil	1364	Removed approx. 51 bbls rust, crude oil, and paraffin wax
	11/2/95	CTCO-3024		1371	Arrived Pre-Cleaned
	11/3/95	CTCO-3025		1373	Arrived Pre-Cleaned
	2/3/96	CTCO-194-25	Carbon Oil	1378	Removed approx. 35 bbls of carbon oil and slurry oil

^{* -} Based on date from Marine Chemist's Gas Free Certificate

SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS COMPANY **VESSEL NUMBER** ADDITIONAL INFO. DATE(S)* PREVIOUS 3: CARGOES WORK ORDER NO. Leevac/Domar Marine 5/16/85 Domar 7001 Crude Oil Cleaned barge 895 8/21 - 9/13/85 Domar 115 Arrived Pre-cleaned Crude Oil, Black Oil 909 1/2/86 Domar 118 Black Oil, #6 Oil 1011 Cleaned black oil and B.S. & W. 10/26 -Domar 6501 500 bbls of paraffin, oil & scale #6 Oil 1017 12/7/87 removed 2/14/88 Domar 115 Gasoline, Diesel Cleaned out gas/diesel in 14 tanks 1030 Domar 6501 7/6/88 #6 Oil 1076 Arrived Pre-Cleaned

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 4

SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS DATE(S)* **VESSEL NUMBER PREVIOUS 3 CARGOES** COMPANY WORK ORDER NO. ADDITIONAL INFO. Tallen Marine 8/29/90 T-13 1179 Washed tanks of diesel oil Diesel (3x) 9/19/90 Glenn C Diesel (3x) 1182 Washed tanks of diesel oil T-13 6/19/91 Diesel Fuel (3x) 1216 Fuel oil 6/26/92 T-13 Diesel 1254 Fuel oil Rig Runner Diesel, Water Fuel oil approx. 1 3/4 bbls. 8/3/93 1285 T-13 9/23/93 Diesel Fuel (3x) 1289 6 cargo tanks fuel oil & rust 10/31/94 T-13 Diesel (3x) 1339 Stripped tanks of fuel residue 6/9/95 Glenn C Diesel Fuel (3x) 1358 Cleaned 4 main cargo tanks, sludge

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 8

* - Based on date from Marine Chemist's Gas Free Certificate

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	PROBAE	LE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY I	PRESENT IN TANKS AND	PITS
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
L & L Oil Company	10/5/94	Linda Jo	Diesel (3x)	1336	Approx. 28 bbls. rust

·	PROBA	LE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY F	PRESENT IN TANKS AND	PITS		
COMPANY			PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO		
Martin Gas Marine	12/13/91	MGM 307	Gas - Oil	1224	Approx. 18 bbls of rust and scale		

SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS										
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.					
Beazer-East, Inc. (formerly Kopper's Company)	5/2/86	JAR-12		961	Approx. 1852 bbls of coal tar-removed					
· ·	7/4/86	JAR-8		972	Cleaned creosote and coal tar from tanks. Approx. 60 bbls.					

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	PROBAB	LE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY I	PRESENT IN TANKS AN	Page D PITS
COMPANY	DATE(S)+	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Jnion Meckling Corp.	8/4/77	UMC-945	Asphalt	264	No additional information
•	11/7/77	UMC-946	Creosote	306	No additional information
, ·	2/18/78	UMC-910	p-Xylene	unavailable	No additional information
•	4/7 - 10/78	UMC-933	Styrene	180	No additional information
	5/15/78	UMC-2605	Vinyl acetate	189	No additional information
	5/29/78	UMC-927	Carbon tetrachloride	191	No additional information
	9/19 - 20/78	LCD-4930	Styrene	335	No additional information
	4/18/79	NMS-1459	Methanol	380	No additional information
,	5/21 & 30/79	UMC-916	Vinyl acetate	387	No additional information
j	6/13/79	UMC-932	Coal Tar	393	No additional information
	7/18/79	UMC-911	Styrene	unavailable	No additional information
	10/3/79	4931	Styrene	442	No additional information
	1/5/80	LCD-4630	Black Oil	471	removed dirty black oil from barge
	3/15/80	UMC-4634	Black Oil and Coal Tar	491	removed olsok oil and coal tar
	3/17/80	UMC-4908	Black Oil and Coal Tar	492	removed black oil and coal tar
	4/3/80	UMC-908	Styrene	unavailable	No additional information
	10/8/80	UMC-905	Molasses	553	removed molasses
	12/4/80	UMC-950	Coal Tar	559	removed heavy black oil from tank bottoms
	6/15/81	DM-927	Carbon tetrachloride	590	removed black oil and heavy rust
	1/10/81	UMC-360	Black Oil and Coal Tar	564	removed black oil and coal ar

	PROBAR	LE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY F	RESENT IN TANKS ANI	Page 2 D PITS
COMPANY	DATE(S)*	VESSEL NUMBÉR	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Union Meckling Corp.	5/10/81	DM-904	Molasses	581	removed molasses.
(cont'd)	7/11/81	DM-944		591	removed heavy products
	10/4/81	DM-947	Coal tar and creosote	626	removed heavy 8" to 1 1/2" of coal tar and creosote
y. 	11/6/81	DM-932	Coal tar	627	cleaned out coal tar for repair
	12/4/81	DM-605		632	Arrived Pre-Cleaned
	12/1/81	DM-2601		633	Arrived Pre-Cleaned.
	12/10/81	DM-904	wax, tallow	640	double skin barge removed wax tallow
Dravo-Mechling	11/25/81	DM-915	Gasoline	683	Arrived Pre-Cleaned
	1/5 - 19/82	DM-927	Carbon tetrachloride	644	carried carbon tetrachloride; chemist regd rewashing
	2/7/82	DM-953	coal tar and creosote	646	removed coal tar and creosote
. 1	3/7/82	DM-2606		654	Arrived Pre-Cleaned
	4/8/82	DM-909	coal tar	656	double skin removed coal tax and other products
	5/7/82	DM-946		663	very little cleaning cert. mainly for hotwork
-	7/3/82	DM-910	en e	665	removed heavy products out of double skin barge
	8/6/82	DM-945	coal tar and creosote	667	removed coal tar and creosote
	8/4/82	DM-944	Creosote, coal tar	669	removed coal tar and creosote
	10/5/82	DM-951	coal tar and cresote	672	removed coal tar and creosote

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	PROBAL	BLE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY P	RESENT IN TANKS AN	Page S D PITS
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Drave-Mechling	10/8/82	DM-947	Asphalt	670	removed coal tar and creosote
(cont'd)	11/11/82	DM-2609	Creosote & Asphalt	674	removed coal tar and creosote
•	12/14/82	DM-932	Creosote & Asphalt	727	removed coal tar and creosote
	2/6/83	DM-2608	Coal tar and creosote	728	removed coal tar and creosote
	3/10/83	DM-952		735	removed heavy products from dbi skin barge
	5/1/83	DM-2607	coal tar and creosote	738	removed coal tar and creosote
	6/3/83	DM-604	coal tar and creosote	739	removed heavy coal tar and oil
	9/1/83	PTC-502	Carbon Black	801	Arrived Pre-Cleaned
•	10/4/83	DM-949	asphalt, No. 6 oil	784	removed asphalt and 6 oil
	10/5/83	DM-932		802	Cleaned
•	11/1/83	DM-945	coal tar and cresote	803	removed coal tar and creosote
	1/2/84	DM-951	light oil	807	cleaned light oil
	1/12/84	DM-918	Carbon tetrachloride	811	Removed:6 oil and coal tar
	1/12/84	DM-917	Carbon tetrachloride	812	Arrived Pre-Cleaned
	2/1/84	DM-924		808	Arrived Pre-Cleaned
\$	3/5/84	DM-954		816	Arrived Pre-Cleaned
	4/1/84	DM-947	heavy tank bottoms, coal tar, cresote	815	removed heavy tank bottoms, coal tar and creosote
į	4/3/84	DM-931	Sunflower Oil	821	removed sun flower oil
	4/17/84	DM-925	Ethyl acrylate	823	Arrived Pre-Cleaned

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	PROBA	BLE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY P	RESENT IN TANKS AN	Page 4
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Dravo-Mechling (cont'd)	5/1/84	DM-948	Coal tar and cresote	817	removed heavy coal tar and creosote
, i	5/6/84	DM-906		827	Arrived Pre-Cleaned
•	5/22/84	DM-921	Acrylates	828	Arrived Pre-Cleaned
	6/2/84	DM-944		824-B	Arrived Pre-Cleaned
	7/1/84	DM-901	Blended fuel	832	cleaned for naptha was carrying blended fuel
	9/4/84	DM-905	Styrene	835	removed solidified styrene
	11/9/84	GTC-5		846	Barge washed for lay up all heavy product was left
	12/7/84	DM-9731	Corn Oil	877	removed corn syrup and water
	3/28/85	DM-905	Asphalt	886	removed coal tar and creosote
	7/2/85	DM-952	Coal Tar	901	removed coal tar and creosote
.	8/26/85	Paul Bunyan 4504		912	Arrived-Pre-Cleaned
3 .	9/26/85	DM-922	Corn Oil	914	removed corn oil and clean produc
	11/1/85	DM-944	Coal tar, Oil	917	, removed coal ter and resid oil
	1/7/86	DM-949	"Black Oil"	925	bucketed out heavy products
	1/20/86	LCD-4901	Diesel Oil	959	Arrived Pre-Cleaned, Removed mud and rust from rake.
	2/4/86	DM-928	Black Liquor	957	cleaned D/S barge black liquor
1	3/2/86	DM-905	Coal tar and creosote	959	barge contained coal tar and craosote removed

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	PROBAI	BLE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY F	RESENT IN TANKS AN	Page 5 D PITS
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Dravo-Mechling (cont'd)	5/19/86	DM-946	"Black Oil", coal tar, creosote	965	barge contained heavy bottoms of coal tar and creosote
	6/13/86	DM-958	Styrene	973	barge contained styrene polymer removed
)	6/30/86	DM-932	Coal Tar	953	removed coal tar and creosote
	8/19/86	DM-950	Coal Tar	976	barge contained coal tar and creosote removed
	12/5/86	DM-945	Coal Tar	990	barge contained heavy bottoms of creosote and coal tar
	2/3/87	NMS-3101	Asphalt	997	cleaned paraffine and sludge for change of cargo
	3/13/87	DM-951	Coal Tar	996	barge contained heavy bottoms of coal tar and creosote removed
	5/8/87	NMS-3103	No. 6 Oil	1002	contained coal tar 6 oil, and sludge removed
)	6/10/87	DM-948	Coal Tar	1004	barge contained creosote and resid(illegible)
	7/24/87	DM-932	Coal Tar	1008	barge contained heavy products of coal tar removed
	12/28/87	DM-2608	"Black Oil"	1018	barge contained heavy products of coal tar removed
*****	3/2/88	DM-953		882	removed heavy black product
•	4/8/88	DM-947	Coal Tar	1040	barge contained heavy products creosote and coal tar removed
	7/14/88	DM-952	Coal Tar	1077	barge contained coal tar bottoms removed

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	PROBAB	LE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY P	RESENT IN TANKS AN	Page 6 D.PITS
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Dravo-Mechling (cont'd)	9/6/89	DM-932	Coal Tar	1132	approx. 880 bbls of heavy products 6 oil, and asphalt removed
	10/16/89	DM-947	Creosote & Crude Oil	1137	barge contained coalstar and creosote bottoms removed
	1/29/89	DM-949	Coal Tar	1149	Cleaned 4 1/2 feet of coal tar residue
	3/6/90	DM-949	Black Oil	1149	removed 480 short tons of oil and creosote
National Marine Services	10/27/89	950	Coal Tar	1136	barge contained coal tar and resid oil bottoms removed
	3/21/90	NMS-3109	Asphalt & No. 6 Oil	1158	barge contained 6 oil and asphalt removed sludge from bottoms
	9/22/86	NMS-3107	No. 6 Oil	987	barge contained heavy bottoms of coal tar and asphalt removed
	9/22/86	LTC-66	Crude Oil	997	contained asphalt and 6 oil removed
	11/8 - 17/86	NMS-3102	Asphalt	988	contained asphalt and 6 oil removed
	5/28/88	NMS-3109	Asphalt	1046	Arrived Pre-Cleaned
	8/26/88	NMS-3104	No. 6 Oil	1082	barge contained coal tar and creosote bottoms removed
	11/8/88	DM 952	Coal Tar	1097	barge contained 6 oil bottoms removed
ţ	12/7/88	NMS-3105	No. 6 Oil	1099	barge contained asphalt and 6 oil bottoms removed.

	PROBAI	BLE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY P	RESENT IN TANKS AN	Page 7 D PITS
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
•	2/20/89	NMS-1350	No. 6 Oil	1113	barge contained asphalt and 6 oil bottoms removed
National Marine Services (cont'd)	12/11/89	NMS-3303	No. 6 Oil	1143	barge contained coal tar and resid oil bottoms removed
)	12/28/89	NMS-3108	No. 6 Oil	1144	barge contained 6 oil and asphalt removed sludge from bottoms
	1/21/91	NMS-2301	Asphalt	1195	325 bbls removed of heavy oil product
•	12/23/91	NMS-3101	Asphalt	1223	bottoms contained 6 oil removed
	5/7/91	NMS-3105	No. 6 Oil	1207	bottoms contained 6 oil removed
·	6/10/91	NMS-3104	No. 6 Oll	1208	bottoms contained 6 oil removed
	1/21/94	NMS-3102	No. 6 Oil, Asphalt, Unk.	1297	removed approx. 328 bbls of asphalt
	3/1/94	NMS-3103	Asphalt	1298	removed approx. 453 bbls hard asphalt & B.S. & W.

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CUSTOMER	*:	1977	1978	1979	1980	1981	1982	1983	1984	198 5	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996
National Marine Service	93	2	5	5	6	7	11	7	, 8 , .	4	11	, 6	6	7	2	4			2		
Cenac Towing Company	31												1	1	3	2 2	5	, 9	6	3	: 1.
Transerve Marine, Inc.	11.									3	. 4	1	1	3	1						
Ashland Oil Company	15												2	2 :			2	2	3	4	
Higman Towing Company	15												2	3.,	1	1	1	1	3	3	
Tallen Marine	8														2	1	1	2	, 1 ,	1 %	
Sabine Towing & Transp.	9						1.				2.3		3	2							
Ingram Barge Lines	9		**									77	6	1	2 .						
Leevac/Domar Marine	4									j	2		្ន 1								
Allied Towing Corporation	1									•											
Canal Barge Co.	. 2													2							
Koppers Company	2										2										
Hollywood Marine	4 ,											2		1	. 2						
Marine Operators, Inc.	0																				
Sargent Marine	1																			1	
L & L Oil Company	1																		1		
Martin Gas Marine	1															417					
Sun Oil Company	1													1							

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		SBA SHIPYARDS	INC		
·	CALCUL	ATION OF RELATIVE LIABILITY US			
COMPANY	PROD. TYPE/RESIDUE VOL. FACTOR	HAZARD FACTOR	TIME PERIOD FACTOR	TOTAL PTS	%
National Marine Service (93)	(14 bgs X 1) + (79 bgs X 2) = 172	(37 bgs X 1) + (56 bgs X 2) = 149	$(6 \text{ bgs } \times 1) + (32 \text{ bgs } \times 2) + (37 \text{ bgs } \times 3) + (18 \text{ bgs } \times 4) = 259$	580	53.16%
	$(7 \text{ bgs } \times 1) + (24 \text{ bgs } \times 2) = 55$	(28 bgs X 1) + (3 bgs X 2) = 34	(26 bgs X 1) + (5 bgs X 2) + (Q bgs X 3) + (Q bgs X 4) ≈ 36	125	11.48%
	(Z bgs X 1) + (4 bgs X 2) = 15	(11 bgs X 1) + (Q bgs X 2) = 11	$(\underline{0} \text{ bgs } \times 1) + (\underline{8} \text{ bgs } \times 2) + (\underline{3} \text{ bgs } \times 3) + (\underline{0} \text{ bgs } \times 4) = \underline{25}$	51	4.67%
Higman Towing Co. (15)	$(Q \text{ bgs } X \text{ 1}) + (\underline{15} \text{ bgs } X \text{ 2}) = \underline{30}$	(15 bgs X 1) + (Q bgs X 2) = 15	$(9 \text{ bgs } \times 1) + (6 \text{ bgs } \times 2) + (0 \text{ bgs } \times 3) + (0 \text{ bgs } \times 4) = 21$	66	6.05%
	$(Z \text{ bgs } X \text{ 1}) + (\underline{8} \text{ bgs } X \text{ 2}) = \underline{23}$	(12 bgs X 1) + (3 bgs X 2) = 18	$(11 \text{ bgs } \times 1) + (4 \text{ bgs } \times 2) + (0 \text{ bgs } \times 3) + (0 \text{ bgs } \times 4) = 19$	60	5.50%
allen Marine (8)	(8 bgs X 1) + (0 bgs X 2) = 8	(<u>8</u> bgs X 1) + (<u>Q</u> bgs X 2) = <u>8</u>	(6 bgs X 1) + (2 bgs X 2) + (0 bgs X 3) + (0 bgs X 4) = 10	26	2.38%
abine Towing/Transp. (9)	(Q bgs X 1) + (9 bgs X 2) = 18	(9 bgs X 1) + (0 bgs X 2) = 9	$(0 \text{ bgs } \times 1) + (7 \text{ bgs } \times 2) + (2 \text{ bgs } \times 3) + (0 \text{ bgs } \times 4) = 20$	48	4.22%
ngram Barge Lines (9)	(1 bgs X 1) + (8 bgs X 2) = 11	(6 bgs X 1) + (3 bgs X 2) = 12	(Q bgs X 1) + (9 bgs X 2) + (Q bgs X 3) + (Q bgs X 4) = 18	41	3.76%
sevac/Domar Marine (4)	(Q bgs X 1) + (4 bgs X 2) = 8	(3 bgs X 1) + (1 bgs X 2) = 5	(Q bgs X 1) + (2 bgs X 2) + (2 bgs X 3) + (Q bgs X 4) = 10	23	2.11%
Illied Towing Corp. (1)	(Q bgs X 1) + (1 bgs X 2) = 2	(1 bgs X 1) + (0 bgs X 2) = 1	$(Q \text{ bgs } \times 1) + (Q \text{ bgs } \times 2) + (3 \text{ bgs } \times 3) + (Q \text{ bgs } \times 4) = 9$	12	1.10%
ollywood Marine (4)	(<u>O</u> bgs X 1) + (<u>4</u> bgs X 2) = <u>8</u>	(4 bgs X 1) + (Q bgs X 2) = 4	(Q bgs X 1) + (4 bgs X 2) + (Q bgs X 3) + (Q bgs X 4) = 8	20	1.83%
anal Barge Co. (2)	(Q bgs X 1) + (2 bgs X 2) = 4	(<u>Q</u> bgs X 1) + (<u>2</u> bgs X 2) = <u>4</u>	(Q bgs X 1) + (2 bgs X 2) + (Q bgs X 3) + (Q bgs X 4) = 4	12	1.10%
oppers Company (2)	(Q bgs X 1) + (2 bgs X 2) = 4	(1 bgs X 1) + (2 bgs X 2) = 4	(0 bgs X 1) + (2 bgs X 2) + (0 bgs X 3) + (0 bgs X 4) = 4	12	1.10%
larine Operators, Inc. (0)	$(\underline{Q} \text{ bgs } X \text{ 1}) + (\underline{Q} \text{ bgs } X \text{ 2}) = \underline{Q}$	$(\underline{Q} \text{ bgs } X \text{ 1}) + (\underline{Q} \text{ bgs } X \text{ 2}) = \underline{Q}$	(Q bgs X 1) + (Q bgs X 2) + (Q bgs X 3) + (Q bgs X 4) = Q	0	0.00%
argent Marine (1)	(Q bgs X 1) + (1 bgs X 2) = 2	(1 bgs X 1) + (Q bgs X 2) = 1	$(1 \text{ bgs } \times 1) + (0 \text{ bgs } \times 2) + (0 \text{ bgs } \times 3) + (0 \text{ bgs } \times 4) = 1$	4	0.37%
& L Oil Company (1)	(Q bgs X 1) + (1 bgs X 2) = 2	(1 bgs X 1) + (0 bgs X 2) = 1	$(1 \text{ bgs } \times 1) + (0 \text{ bgs } \times 2) + (0 \text{ bgs } \times 3) + (0 \text{ bgs } \times 4) = 1$. 4	0.37%
Martin Gas Company (1)	(Q bgs X 1) + (1 bgs X 2) = 2	(1 bgs X 1) + (0 bgs X 2) = 1	(1 bgs X 1) + (0 bgs X 2) + 0 bgs X 3) + (0 bgs X 4) = 1	4	0.37%
un Oil Company (1)	$(0 \text{ bgs } \times 1) + (1 \text{ bgs } \times 2) = 2$	(1 bgs X 1) + (Q bgs X 2) = 1	(<u>Q</u> bgs X 1) + (<u>1</u> bgs X 2) + (<u>Q</u> bgs X 3) + (<u>Q</u> bgs X 4) = <u>2</u>	. 5	0.48%
			TOTAL POINTS =	1091	100.00%
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			4		
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COMPANY	DATE *	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER #	ADDITIONAL INFO.
	3/17/78	7041	Crude Oil	not available	not available
	4/16/78	7042	Crude Oil	179	Clean and gas free barge
	5/24/78	7043	Suspected crude oil	179	Gas Free, and clean tank Barge safe for men and fire
	11/10/78	7044	Unknown hydrocarbon	343	Gas Free Barge safe for men and hot work
	1/8/79	7020	Crude Oil	351	Gas Free Tank Barge 7020 safe for men and fire
	2/12/79	7020	Crude Oil		Washed and drained
	3/12/79	Sinclair #8	Suspected rust and sludges	366	Gas Free tank Barge, pick up rust and sludge, back rinse tanks and dry out, safe for men and fire
	4/10/79	7020	suspected crude oil	363	Gas Free 20,000 BBL. Tank Barge safe for men and fire
	4/9/79	7033	suspected crude oil	373	Gas Free 12,000 BBL. Box Barge safe for men and fire
	4/25/79	NMS 1459	suspected water and oil produced from inter bottoms	380	Gas Free double skin Tank Barge including water and products from middle bottom voids, for hot work
	3/18/79	7020	Kerosene	385	Gas fee 20,000 BBL. Barge safe for men and fire, dry out for cargo, rebuilt on hatches and pump wells
•	6/8/79	7020	Kerosene	391	Gas Free and clean Barge, safe for men safe for fire. Dry tank.
	7/24/79	7026	Bunker C	396	Gas free and clean 6 oil Barge, safe for men safe for fire including rake tanks, pipe lines, etc.
	9/25/79	7020	Crude oil	not available	Washed and drained
₩	10/2/79	7041	suspected crude oil	438	Gas Free and clean tank barge, including rakes, pipe lines and pump wells, safe for men safe for fire
	Conoco Oli/ Continental Oli	Gonoco Oll/ Continental A/16/78 4/16/78 5/24/78 11/10/78 1/8/79 2/12/79 3/12/79 4/9/79 4/9/79 4/9/79 6/8/79 7/24/79 9/25/79	3/17/78 7041	3/17/78 7041 Crude Oil	COMPANY DATE * VESSEL # PREVIOUS 3 CARGOES WORK ORDER #

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COMPANY	DATE *	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER #	ADDITIONAL INFO.
	10/15/79	7001	Crude Oil	440	Gas Free and clean main tanks, pumproom, rake ends and interbottom tanks, safe for men safe for fire including pipe lines
•	10/19/79	7002	Crude Oil	439	Gas free and clean pump room compt. cargo tank and voids and wing walls including pipe lines, safe for men safe for fire
•	1/21/80	7002	Crude Oil	478	Gas free double skin tank barge including pump room, pipe lines, etc. safe for men, safe for fire
	2/12/80	7027	Crude Oil	480	Gas Free, clean main cargo tanks, rakes, voids, pipe lin and cargo pump, safe for men, safe for fire
	2/19/80	NMS 1459	suspected detergent, scale, rust	484	Gas Free double skin, 10,000 BBI. Tank Barge, remove scale and rust from cargo tank, chemical & steam Barg safe for men and fire
	4/22/80	7041	Crude Oil	498	Gas Free and clean barge, safe for men, safe for fire, ir order to make repairs
	5/2/80	7043	suspected crude oil	501	Gas Free and clean tank barge, safe for men, safe for fire, including rake tank
	5/13/80	7004	Crude Oil, Soybean Oil	504	Gas free 30,000 BBL. tank Barge carrying crudt and so bean oil, safe for men, safe for fire including pipe lines, pump wells and rake ends
	7/8/80	7006	suspected soy bean oil and distillate	513	Gas free and clean 300 x 50 x 15' tank barge. Safe fo men, safe for fire and for change of cargo - soybean oil and gas oil last cargo
	8/19/80	7007	suspected soybean and gas oil distillate	521	Gas Free and clean 300' x 50' x 15' Tank Barge safe fo fire and change of Cargo, cargoes carried, Soy Bean Oil and gas oil

	COMPANY	DATE *	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER #	ADDITIONAL INFO.
		8/27/80	7002	Distillate	519	Gas Free and clean double skin tank barge safe for mer and safe for fire, including pump room, cargo and hydrolic piping
w.		10/17/80	7001	crude oil	524	Gas Free and clean double skin tank barge, safe for mer safe for fire including pump room, wing tanks and all piping systems. This Barge had a deposit of heavy products in two cargo tanks which had to be loosened with air hammers, and bucketed from tanks, requiring extra hrs. of cleaning time
		10/22/80	7006	suspected heavy crude oil	555	Hot water wash Tank Barge, flush and drop pipe lines and pump wells, dry tanks, pick up as required for change of cargo, tanks contained deposit of wax which had to be picked up and then tanks rewashed.
		10/22/80	7007	suspected crude oil and wax	556	Hot water wash products from main cargo tank, flush pipe lines and pump well, pick up and dry tanks. Pick u tanks and rerinse.
		2/16/81	7043	Crude Oil	574	Gas Free and clean vessel, safe for men, safe for fire, including pipe line and voids.
		4/13/81	7003	Crude Oli	577	Gas free and clean 265' x 54 x 12' double skin tank barge, carving heavy products, necessary to bucket our residue, clean, safe for men, safe for fire, including coils pipe lines and deck boxes.
	,	7/31/81	7043	Crude Oil	594	Gas free and clean tank barge, safe for men, safe for ho work, including pipe lines, pollution boxes, rakes, and pump wells.

COMPANY	DATE +	VESSEL#		WORK ORDER #	ADDITIONAL INFO.
	3/1/82	7027	Diesel*	not available	not available

TOTAL BARGES CLEANED FOR THIS CUSTOMER =



COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOS	WORK ORDER#	ADDITIONAL INFORMATION
Barge Transport Co.	8/21/70 -	Cape Cod	Suspect crude oil	3693	Gas free 8500 barrel tank barge
1818 McKinney Avenue Houston, TX 77003	8/31/70	Denver	Suspect crude oil	3697	Gas free 8400 barrel tank barge
	3/30/71	Curtis, Jr.	Suspect crude oil	3768	Gas free 8,500 barrel tank barge
	12/20/73 ⁻	Jimmie T	Suspect crude oil	3975	Gas free tank barge
	1/22/74	Cherokee	Suspect crude oil	3977	Gas free 8,500 barrel tank barge
	1/29/74	Choctaw	Suspect crude oil	3981	Gas free vessel
	2/26/74	Cape May	Suspect crude oil	3984	Gas free 9,000 barrel tank barge
	4/1/74	Trinity	Suspect crude oil	3989	Gas free 8,500 barrel tank barge
	4/4/74	Denver	Suspect crude oil	3991	Gas free 8,500 barrel tank barge
	4/8/74	Shasta	Suspect crude oil	3992	Gas free 17,000 barrel tank barge
	5/7/74	St. Clair	Light Crude Oil	4000	Gas free 8,500 barrel tank barge
•	5/28/74	Shavano	Suspect crude oil	4004	Gas free 16,000 barrel tank barge
	6/26/74	Ranier	Suspect crude oil	4008	Gas free 17,0900 barrel tank barge
	7/2/74	Huran	Suspect crude oil	4010	Gas free 8,500 barrel tank barge
	8/5/74	Curtis, Jr.	Suspect crude oil	4011	Gas free 8,500 barrel tank barge
	8/27/74	Salvador	Suspect crude oil	4016	Gas free 8,500 barrel tank barge
	9/16/74	Cape Cod	Suspect crude oil	4021	Gas free 9,000 barrel tank barge
•	7/78	Choctaw	Suspect crude oil	195	Cleaned barge including bow rake
· · · · .	11/78	St. Clair	Light Crude Oil	347	Cleaned-barge

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Barge Transport Co. 1818 McKinney Avenue	12/78	Trinity	Crude Oil	345	Cleaned barge
Houston, TX 77003	3/79	Jimmie T	Suspect crude oil	368	Gas free 9000 barrel tank barge
	3/79	Betty	Crude Oil	375	Cleaned 8,500 bbl barge
	3/79	Neuces	Crude Oil	376	Gas Free Tank barge
	5/79	St. Clair	Light Crude Oil	386	Gas free 8,500 bbl tank barge
	6/79	San Jacinto	Crude Oil	388	Gas free 8,500 bbl barge
	6/79	Cape Cod	Crude Oil	392	Gas free 8,500 bbl barge
,	6/79	Lavaca	Crude Oil	390	Gas free 8,500 bbl barge
	9/79	Neuces	Crude Oil	420	Gas free tank barge
	10/79	Jimmie T.	Crude Oil	441	Gas free and clean 8,500 bbl tank barge
	.10/79	Comanchie	Crude Oil	444	Gas free and flush cargo lines or 8,500 bbl barge
	11/79	Brazos	Crude Oil	448	Gas free 8,500 bbl tank barge
	2/80	Apachie	Crude Oil	487	Gas free 9,500 bbl tank barge
	4/80	Cape May	Crude Oil	494	Gas free and clean 9,000 bbl tank barge
	4/80	Ontario	Crude Oil	500	Gas free and clean 9,000 bbl tank barge; rust, scale heavy products
	5/80	Cape Cod	Crude Oil	499	Gas free and clean barge
	6/80 ·	Brazos	Crude Oil	510	Gas free and clean barge
,	7/80	Jimmie T.	Crude Oil	503	Gas free 8,500 tank barge
	7/80 ⁻	Neuces	Crude Oil	516	Gas free barge
	9/80	Panama	Crude Oil	517	Gas free and clean tank barge
	10/80	Apache	Crude Oil	554.	Gas free and clean 9,000 bbl tank barge
	3/81	Navidad	Crude Oil	575	Gas free vessel - 208 man hours



SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS COMPANY DATE(S)+ **VESSEL NUMBER** PREVIOUS 3 CARGOES WORK ORDER NO. ADDITIONAL INFO. Beazer-East, Inc. **JAR-12** Approx. 1852 bbls of coal 5/2/86 961 (formerly Kopper's Company) tar removed 7/4/86 JAR-8 972 Cleaned creosote and coal. tar from tanks. Approx. 60 bbls.

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 2

* - Based on date from Marine Chemist's Gas Free Certificate

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	PROBABI		SBA SHIPYARDS, INC.	RESENT IŅ:TANĶS AŅI)/PITS
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Martin Gas Marine	12/13/91	MGM 307	Gas - Oil	1224	Approx. 18 bbls of rust and scale

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 1



SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS							
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.		
L & L Oil Company	10/5/94	Linda Jo	Diesel (3x)	1336	Approx. 28 bbls. rust		

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 1



SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS DATE(S)* **VESSEL NUMBER PREVIOUS 3 CARGOES** WORK ORDER NO. ADDITIONAL INFO. 5/16/85 Domar 7001 Crude Oil 895 Cleaned barge 8/21 - 9/13/85 Domar 115 Crude Oil, Black Oil 909 Arrived Pre-cleaned Black Oil, #6 Oil 1/2/86 Domar 118 1011 Cleaned black oil and B.S. & W.

1017

1030

1076

500 bbls of paraffin, oil & scale

removed

Cleaned out gas/diesel in 14 tanks

Arrived Pre-Cleaned

#6 Oil

Gasoline, Diesel

#6 Oil

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 4

10/26 -

12/7/87

2/14/88

7/6/88

Domar 6501

Domar 115

Domar 6501

* - Based on date from Marine Chemist's Gas Free Certificate

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COMPANY

Leevac/Domar

Marine

COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Cenac Towing Company	11/14/88	CTCO 181	#6 Oil, Crude, Condensate	1094	Last cargo 6-oil and crude oil
	5/8/89	CTCO-186	Condensate	1122	Stripped condensate from tanks
)	9/11/90	CTCO 153	Crude Oil	1180	Cleaned out paraffin off of crude oil
	6/4/90	CTCO-188-12	Condensate	1170	Stripped barge of condensate approx. 3 bbls vacuum trucks
	6/4/90	CTCO-189-12	Condensate	1170	Stripped barge of condensate approx. 3 bbls vacuum trucks
,	2/1/91	CTCO-175	Crude Oil	1198	Removed approx. 60 bbls paraffin wax off of crude oil
	10/18/91	CTCO 3022	Crude Oil (3x)	1222	Arrived Pre-Cleaned
	12/31/91	CTCO 154	Slop Oil	1226	Approx. 16 bbls of 6-oil and crude oil removed.
·	2/7/92	CTCO 2312	Crude Oil (3x)	1230	Arrived Pre-Cleaned
	4/5/92	CTCO-2304		1240	Arrived Pre-Cleaned
	5/3/92	CTCO-175		1248	Removed 10 bbls scale, wax & grease
	2/20/92	HBL 3006	Asphalt (3x)	1234	Approx. 12' in #1 port and #2 STB of asphalt
	4/13/92	CTCO 2303	Crude Oil (3x)	1246	Arrived Pre-Cleaned
	5/22/92	CTCO 2311	Crude Oil	1252	Arrived Pre-Cleaned
	8/17/92	CTCO 3005	Asphalt, #6	1256	removed approx. 38 bbls 6-oil, asphalt & rust

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COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Cenac Towing Company	9/4/92	CTCO 1183	Lube Oil	1257	removed approx. 18 bbls B. S. & W.
	11/6/92	CTCO 3003	No. 6 Oil	1262	Removed approx. 168 bbls of rust, asphalt & 6-oil
	1/5/93	CTCO 186-20	Crude Oil	1271	Arrived Pre-Cleaned
	4/5/93	CTCO 3007.	Heavy Slop Oil	1273	Removed approx: 201 bbls of asphalt, rust & 6-oil
	6/11/93	CTCO 181	Waste Water, Drill Water	1280	removed approx. 12 bbls-of-scale and B.S. & W.
	7/15/93	CTCO 196-20	Crude Distillate	. 1283	Cleaned for change of cargo crude oil to diesel
	7/28/93	CTCO 196-26	Waste Water	1284	Cleaned sewage barge rust and scale
	10/15/93	CTCO 3025	Carbon Oil	1292	Cleaned approx. 130 bbls carbon oil
,	9/6/93	CTCO-2001	Light Oil	1290	Stripped vessel for change of cargo light oil
	9/6/93	CTCO 2002	Light Oil	1290	Stripped vessel for change of cargo light oil
	10/5/93	CTOC-197	Light Oil	1293	Stripped light products from barge approx. 76 bbls.
	10/5/93	CTCO-198	Light Oil	1293	Stripped light products from barge approx. 76 bbls.
	10/27/93	CTCO 179	Crude Oil	1295	Arrived Pre-Cleaned

SBA SHIPYARDS; INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS									
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO:				
Cenac Towing Company	3/7/94	CTCO 2003	Condensate, Crude Oil, No. 6 Oil	2736	No additional information				
•	10/4/94	CTCO-198	Crude oil, No. 6 oil	1338	Removed approx. 24 bbls heavy crude and 6-oil				
	5/17/94	СТСО 3025	Carbon Oil, Crude:Oil	1311	Removed approx. 48 bbls product				
	8/9/94	CTCO 3022	Crude Oil	1326	Approx. 25 bbls of product removed				
	8/16/94	CTCO 1524b	Crude Oil	1327	Removed approx. 30 bbls product				
	8/24/94	CTCO 1526b	Crude Oil 3x	1328	Heavy crude oil approx. 90 bbls removed				
	5/1/95	СТСО 230	Crude Oil (3x)	1353	Removed approx. 38 bbls heavy grease and paraffin wax				
	7/9/95	CTCO-194	Crude Oil	1363	Removed approx. 46 bbls of rust, paraffin & crude oil				
	8/1/95	CTCO-195	Crude Oil	1364	Removed approx. 51 bbls rust, crude oil, and paraffin wax				
,	11/2/95	CTCO-3024		1371	Arrived Pre-Cleaned				
	11/3/95	CTCO-3025		1373	Arrived Pre-Cleaned				
	2/3/96	CTCO-194-25	Carbon Oil	1378	Removed approx. 35 bbls of carbor oil and slurry oil				

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 31

^{* -} Based on date from Marine Chemist's Gas Free Certificate

SBA SHIPYARDS, INC. PROBABLE: SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS PREVIOUS 3 CARGOES COMPANY DATE(S)+ VESSEL NUMBER WORK ORDER NO. ADDITIONAL INFO. Sun Oil Co. 5/3/77. JAR-5 Suspect asphalt 170 Wash out/clean vessell for change Sun Marine Terminal of cargo P. O. Box 758 Nederland, TX 77627 4/8/80 Lou II Suspect asphalt 490 Gas free and clean tank barge 11/12/80 Lou III Suspect asphalt 557 Gas free and clean tank barge Gas free and clean 26,000 barrel 7/27/81 Suspect asphalt 588 Lou IV barge 12/19/88 Lou IV **Asphalt** 1104 Clean and gas free tank barge - 1/13/89

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 5

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COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Ashland Oil Company	1/16/87	T-1701	Crude Oil	995	Arrived Pre-Cleaned
	3/30/87	HBL-3011	Coal Tar	999	Arrived Pre-Cleaned
	1/26/88	AO-331	Cumene	1029	Arrived Pre-Cleaned
	6/8/88	AOC-216	Asphait Slops	1045	Removed approx. 400 bbls of hard asphalt; solids disposed off-site
	9/1/88	HTCO-S-2014	Crude Oli	1086	25,000 bbl barge; bottoms contained crude oil; solids disposed off-site
	5/22/89	AO-36	Coal Tar (3)	1118	removed approx. 280 bbls of coal tar; solids disposed off-site
	8/3/89	AO-97	Coke Oven Tar (3)	1126	Heavy asphalt bottoms and B.S. & W. removed; solids disposed off- site
	1/28/92	AOC-216	Black Oil	1227	removed 88 bbls of black oil and slop oil; solids disposed off-site
	8/31/92	AOC-253	Asphalt	1255	removed approx. 1172 bbls sludge, 6-oil and asphalt; solids disposed off-site
	1/25/93	AO-33	Coal Tar, Black Oil	1265	Removed approx. 1460 bbls of 6- oil and asphalt; solids disposed off- site
	3/16/93	AO-5233	No. 6 Oil, Asphalt	1270	Approx. 1652.5 bbls hard asphalt & 6-oil removed; solids disposed off-site

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		PROBAL	BLE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY F	PRESENT IN TANKS AN	D PITS
. 1	COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
		7/9/94	AOC 236	Coal Tar (3x)	1319	Approx. 485 bbls of coal tar and asphalt removed. Disposed at BFI.
	Ashland Oil Company	9/1/94	AO-38	Coal tar, asphalt, No. 6 Oil	1320	Approx. 2126 bbls of coal tar, 6- oil, and asphalt removed. Disposed at BFI.
		11/8/94	AO-36	Black Oil	1332	approx. 2180 bbls hard asphalt and coal tar removed. Disposed at BFI
		1/17/95	AO-27	Recycled Crude, Vacuum Tower Bottoms, Charge Stock	1333	Approx. 2221 bbls of hard asphalt and coal tar. Disposed at BFI.
		6/1/95	AO-B244	Asphalt, coal tar, No. 6 Oil	1344	Hard asphalt, coal tar, and 6-oil removed. Disposed at BFI.
		6/3/95	AO-35		1355	Removed approx. 360 bbls of hard/soft products. Disposed at BFI.
		7/8/95	AOC-253	Asphait, Coal Tar	1361	Removed approx. 720 bbls of asphalt and coal tar (hard). Disposed at BFI.
		9/2/95	HBL-3009	·	1366	Arrived Pre-Cleaned

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 15

SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS COMPANY **PREVIOUS 3 CARGOES** DATE(S)+ **VESSEL NUMBER** WORK ORDER NO. ADDITIONAL INFO. Transerve Marine 11/6/84 Ryan Caustic Soda 1007 Arrived Pre-Cleaned 1/20/85 ATC 586 Caustic Soda, Tallow 955 removed 55 gal of waste oil; also cleaned 7 main cargo tanks of tallow and caustic soda 3/21/85 1-50 Lube Oil 887 Removed lube oil 1-50 878 Arrived Pre-Cleaned 11/13/85 Caustic Soda 920 Ryan Removed heavy deposits of caustic 7/21/86 Hooker Burlington Caustic Soda 975 Arrived Pre-Cleaned 11/17/86 1-50 978 Caustic Soda Removed caustic. 4/21/87 1-50 Corn Oil, Caustic Soda 1003 Removed caustic and corn oil 12/17/86 1-50 Caustic soda 989 Removed caustic and silt 5/26/87 Ryan Caustic Soda 1007 Arrived Pre-Cleaned 1/11/88 **I-50** Caustic Oil/Caustic 881 Removed caustic 3/27/89 TMI-91 Caustic Soda (3) 1119 Cleaned out caustic, mud and rust 8/9/89 TMI-96 **UREA-Ammonium** 1130 Arrived Pre-Cleaned Nitrate 12/4/89 1-50 Soybean & Corn 1145 Removed caustic and corn oil Oil/Caustic Soda 12/13/89 1-50 Corn Oil, Soybean Oil 1145 Approx. 200 bbl of caustic soda and corn oil removed

Caustic Soda

1161

cleaned caustic barge for hotwork

and personnel

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 11

1-50

4/12/90

1.

^{* -} Based on date from Marine Chemist's Gas Free Certificate

COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.				
Higman Towing Company	10/2/88	HTCO-S-2013	: crude oil	1092	25,000 bbl barge; bottoms contained crude oil				
	12/3/88	HTCO-2026	crude oil	1102	25,000 bbl barge; bottoms contained crude oil				
	6/5/89	HTCO-2027	crude oil	1125	25,000 bbl barge; contained crude oil bottoms				
	9/1/89	HTCO-2028	crude oil	1132	25,000 bbl barge; contained crude oil bottoms				
	11/5/89	HTCO-S-2512	crude oil	1139	25,000 bbl barge; contained crude oil bottoms				
·	3/2/90	HTCO-S-2020	crude oil	1156	25,000 bbl barge; contained crude oil bottoms				
	3/3/91	HTCO-DXE-2302	arude. oil	1202	25,000 bbl barge; contained crude oil bottoms				
	4/8/91	HTCO-1802	. Crude Oli (3x)	1206	Arrived Pre-Cleaned				
	12/16/92	HTCO-2021	Crude Oil	1263	10 cargo tanks approx. 86 bbl heavy product and paraffin wax				
	6/24/93	HTCO-2024	Crude Oil (3x)	1282	10 cargo tanks approx. 86 bbl heavy product and paraffin wax				
	1/11/94	HTCO-2514	No. 6 Oil	1301	Approx. 90 bbls of B.S. & W. crude oil bottoms removed				
	4/28/94	HTCQ-2513	Crude Oil (3x)	1308	6-oil mix with sand to oil pit				

SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS COMPANY PREVIOUS 3 CARGOES WORK ORDER DATE(S)* **VESSEL NUMBER** ADDITIONAL INFO. NO. **Higman Towing Company** 7/6/94 HTCO-3001 Kerosene, Crude Oil, Crude oil bottoms removed 1322 Crude Oil Crude oil bottoms removed 7/6/95 HTCO-S-2014 1362 crude oil HTCO-S-2011 12/1/95 1374 crude:oil Crude oil bottoms removed HTCO-3001 Crude Oil (x3) 3/1/95 1346 crude oil and B.S. & W. removed

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 15

SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS								
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.			
Allied Towing	8/21/85	Kelly	Asphalt, Bunker C	911	Removed asphalt and bunker C.			
	4/21/86	Kelly	Asphalt	964	Arrived Pre-Cleaned			
<i>:</i>	8/1/86	I-150	Caustic Soda	978	Arrived Pre-Cleaned			

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 1

COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Sergeant Marine	3/13/95	MC Asphalt 201	Asphalt (x3)	1342	Removed approx. 156 bbls of asphalt, rust and scale.

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 1



	PROBAB	LE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY I	PRESENT IN TANKS; AND PITS	
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Marine Operators	11/15/85	MOP 190	Diesel Oil	921	Arrived Pre-Cleaned

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 0

SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS **VESSEL NUMBER** COMPANY DATE(S)* PREVIOUS 3 CARGOES WORK ORDER: NO. ADDITIONAL INFO. Hollywood Marine 10/17/87 Hollywood 2802 Crude Oil, No. 6 Oil Cleaned barge 1021 Hollywood 1401 Bunker Oil (No. 6) 11/17/87 1013 Cleaned barge 3/8/90 Hollywood 2511 **Suspected Light Crude** Gas free and clean 14 barge tanks 1153 Oil Hollywood 2513 Black Oil, Crude Oil 1166 20,000 bbl barge; 55 bbls contain 5-8/90 rust, scale, and crude oil

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 4

SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS COMPANY DATE(S)* **VESSEL NUMBER PREVIOUS 3 CARGOES** WORK ORDER NO. ADDITIONAL INFO. Ingram Barge Lines 1/9/87 I-B-7027 Crude 994 Arrived Pre-Cleaned 3/5/88 TB-911 1035 Stripped cargo tanks approx. 15 bbls. Stripped cargo tanks approx. 15 3/5/88 WTB-806 1035 bbls. 3/16/88 George #6 Oil/Coal Tar 1033 10 cargo tanks; bucketed outapprox. 20 bbls black & carbon oils 3/30/88 Hollywood 2102 Slop #6 Oil 1037 cleaned out slop oil; #6 oil & B.S. & 5/2/88 Approx. 260 bbls of sludge, wax Hollywood 2523 Slop Oil 1041 and B.S. & W. 10/10/88 IB-1302 Coal Tar (3) 1088 Approx. 600 bbls creosote & coal tar removed. 1/25/89 IB-1308 approx. 60 bbls of product Heavy 1110 Aromatics/Gasoline removed 8/5/90 I-B 908 1178 Barge already gas free, Just Wastewaver pumped water from tank barge 10/5/90 I-B 1926 Ethonol 1185 Approx. 18 bbis of product removed/striped tanks with vacuum truck 11/8/93 IB-2710 Crude Oil 1296 **Arrived Pre-Cleaned**

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 9

	SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS										
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.						
Sabine Towing	3/11/82	ST-123	Crude Oil	653	No additional information						
	4/8/85	STCO-228	NO. 6 oil	892	21,000 bbl barge; 60 bbls 6-oil & rust removed						
	6/1/86	STCO-219	crude oil	968	60 bbls crude & wax removed out of 10 cargo tanks						
	6/2/86	STCO-224	No. 6 oil; crude oil	969	20 bbls of 6-oil and crude oil removed						
	5/23/88	> STCO-230	No. 6 Fuel	1044	23,000 bbl barge; removed approx. 60 bbls boller fuel bunker c.						
	9/22/88	STCO-221	Condensate/Crude Oil	1090	picked up approx. 25 bbls of condensate and crude oil						
	10/6/88	STCO-220	Crude Oil (3)	1091	Picked up approx. 30 bbls of crude oil and paraffin						
Ag.	1/7/89	TBC-2	Water and heavy tank bottoms	1109	Pumped to pits approx. 6,000 bbls of water and heavy tank bottoms						
	4/1/89	STCO-227	crude oil	963	45 bbls crude oil removed						

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 9

SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS								
COMPANY	DATE(S)*	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.			
Canal Barge Company	5/17/89	CBC-137	Coal Tar, Creosote	1121	128 BBLS creosote and coal tar removed from wings and voids			
,	10/25/89	CBC-231	Coal Tar (3)	1138	1804 bbls approx. coal tar, waste oil and a			

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 2

COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Edwards	4/69	Michigan	Suspect crude oil	3534	Gas free 8500 barrel tank barge
Transportation Co.	4/24/70	Cape Henry	Suspect crude oil	3653	Gas free 9000 barrel tank barge
	7/27/70	Naptha	Suspect crude oil	3688	Gas free 26,000 barrel tank barge
	11/30/70	Brazos	Suspect crude oil	3727	Hot water wash tanks to remove wax and file
	1/24/77	Trinity	Crude Oil	5426	Clean and gas free all cargo tanks
	1/5/77	Hiran King	Crude Oil	5429	Clean and gas free all cargo tanks
	2/5/77	Casper	Crude Oil	6446	Clean and gas free all cargo tanks
	2/10/77	Cherokee	Crude Oil	5450	Clean and gas free all cargo tanks
	2/28/77	Cape May	Crude Oil	6488	Clean and gas free all cargo tanks
	3/1/77	Cape Cod	Crude Oil	5480	Clean and gas free all cargo tanks
	3/16/77	Betty	Crude Oil	6512	Clean and gas free all cargo tanks
	5/26/77	Cape May	Crude Oil	6617	Clean and gas free all cargo tanks
	4/21/78	Apache	Crude Oll	6989	Clean and gas free all cargo tanks
	4/27/78	Commanche	Crude Oil	6998	Clean and gas free all cargo tanks
	7/19/78	Choctaw	Crude Oil	7493	Clean and gas free all cargo tanks
	7/31/78	CapeCod	Crude Oil	8108	Clean and gas free all cargo tanks
	8/2/78	Cape May	Crude Oil	8113	Clean and gas free all cargo tanks
	11/14/78	Trinity	Crude Oil	1115	Clean and gas free all cargo tanks
	3/1/79	Jimmie T	Crude OII	8263	Clean and gas free all cargo tanks



 COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Cape May Barge Co.	4/13/70	Cape May	Suspect crude oil	3652	Gas free 9000 barrel tank barge
	4/23/70	Cape May	Suspect crude oil	3652	Gas free 9000 barrel barge



	COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
	Delta Barge Co.	2/4/70	Jimmie T	Suspect crude oil	3622	Gas freeing; heavy wax bottoms
	,	2/23/70	Trinity:	Suspect crude oil	3626	Gas free 8500 barrel tank barge
1	,	12/10/73	Betty	Suspect crude oil	3972	Gas free 8500 barrel tank barge
-		12/31/73	Wyatt	Suspect crude oil	3976	Gas free 6000 barrel tank barge
Ĺ		3/6/74	L.J.Cobb	Suspect crude oil	3983	Gas free tank barge



724,400

COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Choctaw Barge Co.	4/24/70	Choctaw	Suspect crude oil	3646	Gas free 9000 barrel tank barge



COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Navadad Barge Co.	9/4/70	Navadad	Suspect crude oil	3698	Gas free 8400 barrel tank barge



COMPANY	DATES -	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Neuces Barge Co.	9/30/70	Neuces	Suspect crude oil	3708	Gas free 8500 barrel tank barge
	3/15/71	Neuces	Suspect crude oil	3763	Gas free 10.400 barrel tank barge



COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Apache Barge Co.	10/13/70	Apache	Suspect crude oil	3706	Gas free 8500 barrel tank barge



COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Comanche Barge Co.	10/21/70	Comanche	Suspect crude oil	3707	Gas free 8500 barrel tank barge



COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Key West Barge Co.	10/31/70	Key West	Suspect crude oil	3723	Gas free 8500 barrel tank barge



COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Jack Barge Co.	1/22/71	Jack	Suspect crude oil	3746	Gas free 12.200 barrel tank barge



COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
EV Barge Co.	1/31/71	EV	Suspect crude oil	3748	Gas free 13,000 barrel tank barge



	COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
,	Frio Barge Co.	3/16/71	Frio	Suspect crude oil	3764	Gas free 10.400 barrel tank barge



	COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
"	Cape Henry Barge Co.	4/30/71	Cape Henry	Suspect crude oil	3779	Gas free 9,000 barrels heavy wax bottoms



COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Largo Barge Co.	5/19/71	Key Largo	Suspect crude oil	3787	Gas free 9,000 barrel tank barge



COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Cape Charles Barge Co.	6/25/71	Cape Chas.	Suspect crude oil	3792	Gas free 9,000 barrel tank barge



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COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Salvador Barge Co.	10/28/71	Salvador	Suspect crude oil	3830	Gas free 8,400 barrel tank barge



COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Huron Barge Co.	10/28/71	Huron	Suspect crude oil	3831	Gas free 8,500 barrel tank barge



COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Onterio Barge Co.	11/4/71	Onterio	Suspect crude oil	3833	Gas free 8,500 barrel tank barge



CÓMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Windward	1/12/72	Choctaw	Suspect crude oil	3846	Gas free 9,000 barrel tank barge
Transportation Co.	1/18/72	Cherokee	Suspect crude oil	3847	Gas free 9:000 barrel tank barge



÷	COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
·	Panama Barge Co.	3/15/72 - 3/24/72	Panama	Suspect crude oil	3865 and 3865-A	Gas free 17,000 barrel tank barge
		1/29/74	Panama	Suspect crude oil	3979	Gas free 17,000 barrel tank barge



COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Suez Barge Co.	4/17/72	Suez	Suspect crude oil	3866	Gas free 17,000 barrel tank barge



COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER _. #	ADDITIONAL INFORMATION
Christine Towing Co.	4/17/72	Betty	Suspect crude oil	3877	Gas free 9,500 barrel tank barge



COMPANY	DATES	VESSEL#	PREVIOUS 3 CARGOES	WORK ORDER#	ADDITIONAL INFORMATION
Key Sterling Transportation	11/8/73	George E	Suspect crude oil	3969	Gas free 8,400 barrel box barge



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	SBA SHIPYARDS, INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS									
COMPANY	DATE(S)	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.					
Union Mechling	8/4/77	UMC-945	Asphalt	264	Clean and gas free					
	11/7/77	UMC-946	Creosote	y 306	Clean and gas free					
	2/18/78	UMC-910	p-Xylene	Not available	Clean and gas free					
	4/7 - 10/78	UMC-933	Styrene	180	Clean and gas free					
	5/15/78	UMC-2605	Vinyi acetate	189	Clean and gas free					
•	5/29/78	UMC-927	Carbon tetrachloride	191	Clean and gas free					
	9/19 - 20/78	LCD-4930	Styrene	335	Clean and gas free					
,	5/21 & 30/79	UMC-916	Vinyl acetate	387	Clean⊮and gas free					
•	6/13/79	UMC-932	Coal Tar	393	Clean and gas free					
	7/18/79	UMC-911	Styrene	399	Clean and gas free					
	10/3/79	4931	Styrene	442	Clean and gas free					
	1/18/80	LCD-4630	Not available	477	Arrived clean; painted oil barge					
	4/3/80	UMC-908	Styrene	Not available	clean and gas free					
Dravo Mechling	3/19/80	UMC-4634	Black oil and Coal tar	491	Gas free and clean tank of heavy					
	3/25/80	UMC-4908	Black oil and Coal tar	492	Removed heavy product & coal tar.					
·	10/24/80	UMC-905	Molasses	553	removed molasses					
	12/4/80	UMC-950	Coal Tar	559	Gas free and clean tank of heavy product					
	1/26/81	UMC-360	Creosote and Coal tar	564	clean and gas free of creosote and					
	5/25/81	DM-904	Molasses	· · · 581	removed molasses					

	PROBA	BLE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY F	PRESENT IN TANKS AND	Page S
COMPANY	DATE(S)	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Dravo Mechling (cont'd.)	6/15/81	DM-927	Carbon tetrachloride	590	clean and gas free; drained cargo lines; removed heavy rust deposits
	7/29/81	DM-944	Suspect Coal tar	591	Gas free and clean double skin barge
	10/15/81	DM-947	Creosote and coal tar	626	Gas free and clean three main cargo tanks of creosote and coal tar bottoms
• .	11/6/81	DM-932	Suspect Coal tar	627	Gas free and clean 3 main cargo tanks
	11/25/81	DM-915	Gasoline	683	Arrived Pre-Cleaned
	12/2/81	DM-605	Not available	632	Cleaned heavy residue
•	12/14/81	DM-904	Tallow	640	Clean and gas free tank barge
	1/4/82	DM-2601	Suspect Coal tar and asphalt	633	Clean and gas free tank barge; 15 drums of rust scale
· •	1/5/82	DM-927	carbon tetrachloride	644	Clean and gas free tank barge
	2/14/82	DM-953	coal tar and creosote	646	clean and gas free - coal tar and creosote
	4/30/82	DM-909	coal tar	655	clean and gas free - coal tar and other products
	5/27/82	DM-946	Suspect Coal tar, creosote	663	cleaning mainly for hotwork
	7/20/82	DM-910	Suspect Coal tar	665	removed heavy products from double skin barge
	8/4/82	DM-944	Creosote, coal tar	669	removed coal tar and creosote
	8/11/82	DM-945	Coal tar, creosote	667	Clean and gas free coal tar and crosote products from main tanks

	PROBA	BLE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY P	PRESENT IN TANKS AND	Page (
COMPANY	DATE(S)	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Dravo Mechling	10/8/82	DM-947	Asphalt, Coal Tar	670	Gas free and clean cargo tanks
(cont'd.)	10/21/82	DM-951	Suspect Asphalt	672	Gas free and clean cargo tanks
	11/11/82	DM-2609	Creosote, Asphalt, Coal Tar	674	Removed coal tar and creosote
	12/14/82	DM-932	Creosote & Asphalt	727	Removed 8 bbls of heavy product
	2/17/83	DM-2608	Coal tar	728	Cleaned coal tar residue from 6 tanks
	3/25/83	DM-952	Suspect Coal tar, asphalt	735	Removed heavy products from , double skin barge
	5/4/83	DM-2607	Coal Tar and Creosote	738	Removed coal tar and creosote
	6/13/83	DM-604	Coal Tar and Oil	739.	Removed heavy deposit of coal tail and oll
	9/1/83	PTC-502	Carbon Black	801	Arrived Pre-cleaned
	10/18/83	DM-949	Suspect Asphalt or No. 6 oil	748	Clean and gas free
	10/19/83	DM-932	Suspect Coal Tar, Creosote	802	Cleaned only to make repairs
	11/10/83	DM-945	Coal Tar	803	Removed coal tar residue
	1/12/84	DM-917	Carbon tetrachloride	811	Not available
	1/12/84	. DM-918	Carbon tetrachloride	812	Not available
	1/31/84	DM-951	Suspect Asphalt	807	Shoveled product to buckets; removed buckets to deck boxes*
	4/3/84	DM-947	Suspect Coal Tar or Creosote	815	Gas free and clean heavy products

	ŖŖŎŖĄĬ	BLE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY F		Page) PITS
COMPANY	DATE(S)	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Dravo Mechling	4/1.7/84	DM-925	Ethyl acrylate	823	Arrived Pre-Cleaned
(cont'd.)	5/10/84	DM-948	Coal Tar and Cresote	817	Gas free and clean; creosote and coal tar
	5/22/84	DM-921	Acrylates	828	Arrived Pre-Cleaned
	6/4/84	DM-944	Coal tar, creosote	824-A	Gas free and clean; coal tar and creosote
	7/3/84	DM-901	Blended fuel	832	cleaned to carry naptha; was carrying blended fuel
	9/28/84	DM-903	Styrene	835	Removed solidified styrene
	11/21/84	GTC-5	Heavy oil products	846	Pumped heavy oil products from vessell
,	12/7/84	DM-9731	Corn Oil/ syrup	877	Gas free and clean; corn syrup an water
	3/7/96	DM-953	Suspect Coal Tar or Creosote	882-A	Gas free and clean tanks; bucket and shovel heavy materials
	3/28/85	DM-905	Asphalt, Coal Tar, Creosote	886	Removed coal tar and creosote
	7/2/85	DM-952	Coal Tar, Creosote	901	Picked up heavy deposits of coal tar and creosote
	8/26/85	Paul Bunyan 4504	Not available	912	Arrived Pre-Cleaned
	9/26/85	DM-922	Corn Oil	914	Removed corn oil
•	11/18/85	DM-944	Coal Tar, Oil	917	Gas free and clean; coal tar and residual oil
• •	1/7/86	DM-949	Black Oil	925	Bucketed out heavy residue

	PROBA	BLE SOURCES OF CON	SBA SHIPYARDS, INC. TAMINANTS CURRENTLY P	RESENT IN TANKS AND	Page 5 O PITS
COMPANY	DATE(S)	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Dravo Mechling (cont'd.)	1/20/86	LCD-4901	Diesel Oil	959	Arrived Pre-Cleaned. Removed mud and rust from rake.
,	2/4/86	DM-928	Black Liquor	957	Gas free and clean double skin barge
) .	2/21/86	DM-932	Coal Tar, Creosote	953	Gas free and clean; coal tar and creosote with heavy deposits
	3/4/86	DM-905	Coal Tar	959	Gas free and clean; coal tar
	5/1/86	JAR-12	Coal Tar	961	Unavailable
	5/19/86	DM-946	"Black Oil", Coal Tar, Creosote	965	Gas free and clean coal tar and creosote and heavy bottoms
	6/13/86	DM-958	Styrene	973	Clean out styrene polymer; chisel, scrape and bucket from tanks
	8/19/86	DM-950	Coal Tar; Creosote	976	Gas free and clean; coal tar and creosote
	12/5/86	DM-945	Coal Tar; Creosote	990	Gas free and clean; heavy creosote and coal tar deposits
	1/14/87	DM-951	Coal tar; Creosote	996	Gas free and clean; coal tar and creoste
,	2/3/87	NMS-3101	Asphalt	Unavailable	Clean hard asphalt residue - all cargo tanks
	3/2/87	NMS-3103	No. 6 oil, Asphait	997	Gas free and clean; #6 oil and asphalt
	5/8/87	NMS-3105	No. 6 Oil; Coal Tar	1002	Removed heavy deposits of coal tar, #6 oil, and sludge
	6/10/87	DM-948	Coal Tar	1004	Gas free and clean coal tar barge

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	PROBAE	BLE SOURCES OF CON	SBA'SHIPYARDS, INC. TAMINANTS CURRENTLY F	PRESENT IN TANKS ANI	Page 6) PITS
COMPANY	DATE(S)	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
Dravo Mechling (cont'd.)	7/24/87	DM-932	Coal Tar	1008	Clean approximately 40 bbls. of solidified product from three main tanks
	12/28/87	DM-2608	Black:Oil, Coal Tar	1018	Gas free and clean; heavy deposits
	4/8/88	DM-947	Coal Tar; Creosote	1040	Gas free and clean; creosote and coal tar
	7/14/88	DM-952	Coal Tar	1077	Gas free and clean vessel
	10/16/89	DM-947	Creosote & Crude Oil	1137	gas free and clean; pick up approximately 10 drums of heavy product
. *	1/24/90	MOP-142	Drilling mud tanks	1151	Unavallable
	1/29/90	DM-949	Coal tar	1149	Unavailable
National Marine	1/29/69	LCT-65	Not available	3593	Partially gas free first 4 main tanks
	9/30/69	LCT-66	Not available	3594	Gas free front rake tank
	10/13/69	LCT-45	Oil	3596	Gas free after rake tank No. 5
	6/23/70	NMS-2604	Asphalt	3673	Clean and gas free; removal of solidified asphalt
	9/15/70	NMS-3203	Not available	3705	Clean and gas free
	11/23/70	NMS-1605	Sulphuric acid	3699	Gas free sulphuric acid barge
	3/11/71	LCT-50	Asphalt, #6 oil	3751	Gas free 12,000 barrel tank barge:
	3/23/71	NMS-2601	Asphalt, Bunker C	3752	Gas free asphalt and bunker C tanks
	3/31/71	IBC-13	Crude oil	3773	Gas free and clean cargo tanks

PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND I	SBA SHIPVARDS INC.	
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COMPANY	DATE(S)	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO.
National Marine (cont'd.)	4/30/71	NMS-1201	Suspect Light Oil	3786	Gas free double skin vessel carrying Subchapter O cargo
	12/6/73	LTC-102	Asphalt	3962	Gas free and clean asphalt
	4/18/79	NMS-1459	Methanol	380	Gas free and clean all cargo tanks
	9/22/86	LTC-66	Crude oil	Not available	Unavailable
	9/2/86	NMS-3107	#6 oil	977	Clean for change of cargo
•	11/8/86	NMS-3102	Asphalt	988	Clean and gas free vessel
	5/28/88	NMS-3109	Asphalt	1046	clean and gas free vessel
	8/26/88	NMS-3104	#6 oil	1082	Gas free and clean vessel;pick up an bucket out product
,	11/9/88	DM-952	Coal Tar Distillate	1097	Gas free and clean; heavy products
	12/7/88	NMS-3105	#6 oil	1099	Gas free and clean; heavyproducts; approximately 65 bbls.
·	2/20/89	NMS-1350	#6 oil	1113	Clean and gas free barge
	9/6/89	DM-932	Coal tar	1131/1132	Removed 880 bbls of heavy oily product
)	10/27/89	950	Coal Tar	1136	Removed 3 - 5 feet of coal tar from main tanks
	12/11/89	NMS-3203	#6 oil	1143	picked up and bucket out approx. 180 bbls. of heavy products
	12/28/89	NMS-3108	#6 oil	1144	Cleaned for hot work
	3/16/90	DM-949	Oil and Creosote	1149	Removed approximately 480 short tons of oil and creosote
	3/21/90	NMS-3109	Asphalt & No. 6 Oil	1158	Gas free and clean 6 oil and asphalt
•	4/12/90	NMS-3108	Asphalt	1144	Gas free and clean asphalt necessary do hot work

	SBASHIPYARDS INC. PROBABLE SOURCES OF CONTAMINANTS CURRENTLY PRESENT IN TANKS AND PITS							
COMPANY	DATE(S)	VESSEL NUMBER	PREVIOUS 3 CARGOES	WORK ORDER NO.	ADDITIONAL INFO:			
National Marine	6/15/90	DM-1202	Asphalt	1169	Removed asphalt, sand and water			
(cont'd.)	1/21/91	NMS-2301	Asphalt	1195	Gas free and clean barge			
, y	5/7/91	NMS-3105	No. 6 Oil	1207	Removed approximately 8 bbls, of B,S,&W.			
	6/10/91	NMS-3104	No. 6 Oil	1208	Picked up and bucketed approximatey 50 bbls. Of product			
	12/23/91	NMS-3101	Aphalt, No. 6 oil	1223	Removed approximately 349 bbls. of asphalt and #6 oil			
•. •.	1/21/94	NMS-3102	No. 6 Oil, Asphalt	1297	Removed approx. 328 bbls of asphalt			
	3/1/94	NMS-3103	Asphalt	1298	Removed approx. 453 bbls hard asphalt & B.S. & W.			

TOTAL BARGES CLEANED FOR THIS CUSTOMER = 112

Appendix C



Remit to:

L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer	

402174

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

Ship To No:
LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

INVOICE COMMENTS

Invoice Number:

306002183-00

03/10/2003

For Invoice Inquiries & Correspondence: Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

ō Invoice Date:

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
03/10/2003	03/10/2003	306002183-00	12981-9041	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
20,000.00 METER TICKET#		DYED DIESEL FUEL HIGH SULFUR FUEL, NONTAXABLE USE ONLY, PENALTY R VEHICLE USE	GL. FOR	20,000.00 TAXABLE USE	1.1750	23,500,00
					SUBTOTAL	23,500.00
				A A Second Secon	TOTAL TAX	940.00
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CAMERON 06 (337) 775-5727 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.



Remit to:

L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer No:

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

Ship To No:
LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

INVOICE COMMENTS

Invoice Number:

Invoice Date:

306002186-00

03/10/2003

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
03/10/2003	03/10/2003	306002186-00	•	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
138,000.00	WATERCAM	CAMERON CITY WATER	GL	138,000.00	.0035	483.00
					SUBTOTAL	483.00
		100 400 400			TOTAL TAX	19.32
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Sales are subject to terms and conditions on reverse.

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Customer No:

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

Ship To No: P.O. BOX 1190

PURCHASE ORDER REQ'D

JENNINGS

70546

INVOICE COMMENTS

Invoice Number:

306002241-00

For Invoice Inquiries & Correspondence: Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

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Invoice Date:

03/11/2003

SHIP DATE ORDER DATE TICKET NO. **CUSTOMER ORDER NUMBER TERMS** NET30 03/11/2003 03/11/2003 306002241-00 12981-941

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
2.00	1511755	SHELL TELLUS PLUS 46 MD	GL	110.00	3.7300	410.30
					SUBTOTAL	410.30
		isi Wa	ā. Su		TOTAL TAX	16.41

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Customer No:

402174

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

INVOICE COMMENTS

Ship To No:
LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

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Invoice Number:

Invoice Date:

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306005948-00

06/16/2003

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

	SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
i	06/14/2003	06/14/2003	306005948-00	14053	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
15,000.00 METER TICKET#		DYED DIESEL FUEL HIGH SULFUR FUEL, NONTAXABLE USE ONLY, PENALTY R VEHICLE USE	GL FOR	19,000.00 AXABLE USE	.8340	12,510.00
		7. (p 30.) 2. (d 2. (d)			SUBTOTAL	12,510.00
	·			the state of the s	TOTAL TAX	500.40
BILLING LOCAT	TION	PAGE: 1		Total Invoice	Amounta	\$13,010.40

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Customer No:

402174

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

INVOICE COMMENTS

Ship To No:
LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

Invoice Number:

306005956-00

Invoice Date:

06/16/2003

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
06/14/2003	06/14/2003	306005956-00	14053	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
240,000.00	WATERCAM	CAMERON CITY WATER	GL	240,000.00	.0035	840.00
		·			SUBTOTAL	840.00
					TOTAL TAX	33.60
BILLING LOCA	TION				L	\$873.60

BILLING LOCATION

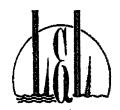
CAMERON 06 (337) 775-5727 PAGE:

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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

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BOAT NAME

HOS GREYSTONE

Ship To No: LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

Invoice Number:

306009567-00

For Invoice Inquiries & Correspondence:

Accounts Receivable P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

Invoice Date:

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09/15/2003

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
09/14/2003	09/14/2003	306009567-00	14926-9043	NET30

METER TICKET# D 01070904 DYED DIESEL FUEL, NONTAXABLE USE ONLY, PENALTY FOR TAXABLE USE NOT FOR MOTOR VEHICLE USE SUBTOTAL 12,600.0	QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
TOTAL TAX 504.		D 01070904 DYED DIESEL	Fuel, nontaxable use only, penalty			.8400	12,600.00
				i A		SUBTOTAL	12,600.00
					موند المساورة المساورة المساو	TOTAL TAX	504.00
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CAMERON 06 (337) 775-5727 PAGE:

Total Invoice Amount:

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Customer	No	٠
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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ*D

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BOAT NAME

HOS GREYSTONE

Ship To No:
LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

Invoice Number:

306009568-00

Invoice Date:

09/15/2003

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
09/14/2003	09/14/2003	306009568-00	14926-9043	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
152,000.00	WATERCAM	CAMERON CITY WATER	GL	152,000.00	.0035	532.00
					SUBTOTAL.	532.00
					TOTAL TAX	21.20
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ILLING LOCAT	TION	PAGE · 1	<u> </u>	Total Inviole		\$553.2

CAMERON 06 (337) 775-5727 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

<u>Customer</u>	No:	

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ!D

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BOAT NAME

HOS GREYSTONE

Ship To No:
LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

Invoice Number:

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306009569-00

Invoice Date:

09/15/2003

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	-0° - 0° N	CUSTOMER ORDER NUMBER	TERMS
09/14/2003	09/14/2003	306009569-00		14526-9043	NET30

TAXES ARE INCLUDED IN THE PRICE FEDERAL TAX OF \$0.184 PER GALLON INCLUDED IN THE PRICE LOUISIANA TAX OF \$0.20 PER GALLON INCLUEDED IN THE PRICE	QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
TOTAL TAX	5.00	TAXES ARE IN FEDERAL TAX	CLUDED IN THE PRICE OF \$0.184 PER GALLON INCLUDED IN	THE	RICE	1.5000	7:50
				4. 17		SUBTOTAL	7.50
					The state of the s	TOTAL TAX	. 00
		·		and the second s	A STATE OF THE STA		

CAMERON 06 (337) 775-5727 Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.



Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

<u>Customer No</u>	<u>o:</u>
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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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BOAT NAME

HOS SILVER STAR

Ship To No:
LEEVAC INDUSTRIES, LLC
P.O. BOX 1190
PURCHASE ORDER REQ'D

JENNINGS

70546

306013924-00

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

Invoice Number:

Invoice Date:

01/21/2004

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
01/20/2004	01/20/2004	306013924-00	161499-9044	NET30

METER TICKET# D 01083059 DYED DIESEL FUEL, NONTAXABLE USE ONLY, PENALTY FOR TAXABLE USE 18,000.00 11 COUISIANA FUEL INSPECTION FEE EA 18,000.00 .0012 SUBTOTAL 18,7	QUANTITY SHIPPED	ITEM NO.	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
18,000.00 II LOUISIANA FUEL INSPECTION FEE EA 18,000.00 .0012 SUBTOTAL 18,7	18,000.00 METER TICKET#	D 01083059 DYED DIESEL		18,000.00	1.0400	18,720.00
TOTAL TAX	18,000.00		EA	18,000.00	.0012	22.50
					SUBTOTAL	18,742.50
		•			TOTAL TAX	748.80
				the second se		
		,		Par Charles and Parketing		
		•		And the state of t		
						\$19,491.30

CAMERON 06 (337) 775-5727 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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BOAT NAME

HOS SILVER STAR

Ship To No:
LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

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Invoice Number:

Invoice Date:

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306013853-00

01/19/2004

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
01/18/2004	01/18/2004	306013853-00	161499-9044	NET3¢

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	им	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
69,500.00	WATERCAM	CAMERON CITY WATER	GL	69,500.00	.0035	243,25
					SUBTOTAL	243.25
					TOTAL TAX	9.73
,						
				100 (100 at 200 at 100		
			Market Company			
BILLING LOCAT	FION					\$252.98

BILLING LOCATION

CAMERON 06 (337) 775-5727 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.



Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer	No:

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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BOAT NAME

K MARINE 22

Ship To No:
LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

Invoice Number:

306050268-00

Invoice Date:

01/22/2007

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
01/17/2007	01/17/2007	306050268-00	24818-9090	NET30

QUANTITY SHIPPED 20,000.00 METER TICKET#	D 01325293 DYED DIESEL	PRODUCT DESCRIPTION DYED DIESEL FUEL HIGH SULFUR FUEL, NONTAXABLE USE ONLY, PENALTY R VEHICLE USE	UM GL FOR	PRICE QUANTITY 20,000.00	UNIT PRICE	EXTENDED PRICE 33,050.00
			大学の とうない はいかい はいない はいかい はいかい はいかい はいかい はいかい はい		SUBTOTAL TOTAL TAX	33,060.00 .00
BILLING LOCA	TION					\$33,060.00

BILLING LOCATION

CAMERON 06 (337) 775-5727 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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BOAT NAME

K-MARINE 22

Ship To No: LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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Invoice Number:

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306050282-00

Invoice Date:

01/19/2007

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

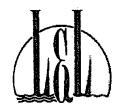
Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
01/18/2007	01/17/2007	306050282-00	24818-9090	NET3 0

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
59,000.00	WATERCAM	CAMERON CITY WATER	GL	59,000.00	.0065	383.50
					SUBTOTAL	383.50
		79	i.		TOTAL TAX	.00
			*			
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•				ي ديمية والمرابعة		
				77.00 Marian sayery		
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BILLING LOCA	TION	PAGE: 1	l	Total Invoice	Amornita	\$383.50

CAMERON 06 (337) 775-5727 1 otal invoice Amount:

To assure proper handling, please state the invoice number on all payments.



Remit to: L&L OIL AND GAS SERVICES, LLC

P.O. Box 201617 • Dallas, TX 75320-1617

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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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BOAT NAME

PAT TILLMAN

Ship To No:
LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

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Invoice Number:

306054289-00

Invoice Date:

05/29/2007

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
05/28/2007	05/28/2007	306054289-00	26609-9083	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
20,000.00 METER TICKET#		DYED DIESEL FUEL HIGH SULFUR FUEL, NONTAXABLE USE ONLY, PENALTY R VEHICLE USE	GL FOR	20,000.00	2.1450	42,900.00
		<u> </u>			SUBTOTAL	42,900.00
				A Company of the comp	TOTAL TAX	.00
		OIL AND GAS SER				
BILLING LOCAT	ION	PACE. 1		Total Invoice	. A	\$42,900.0

CAMERON 06 (337) 775-5727 PAGE: 1

Total Invoice Amount:

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Sales are subject to terms and conditions on reverse.

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Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer	•	No:
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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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INVOICE COMM

BOAT NAME

PAT TILLMAN

Ship To No:
LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

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Invoice Number:

306054290-00

Invoice Date:

05/29/2007

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
05/28/2007	05/28/2007	306054290-00	26609-9083	NET30

METER TICKET# D 01350386 DYED DIESEL FUEL, NONTAXABLE USE ONLY, PENALTY FOR TAXABLE USE NOT FOR MOTOR VEHICLE USB SUBTOTAL 193,050.4	QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
TOTAL TAX		D 01350386 DYED DIESEL	FUEL, NONTAXABLE USE ONLY, PENALTY	"		2.1450	193,050.00
	·			A.		SUBTOTAL	193,050.00
						TOTAL TAX	. ot

CAMERON 06 (337) 775-5727 PAGE:

Total Invoice Amount:

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Sales are subject to terms and conditions on reverse.

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Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer No:

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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<u>TO NO:</u> LEEVAC INDUSTRIES, LLC

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JENNINGS

INVOICE COMMENTS

Invoice Number:

329000581-00

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

Invoice Date:

01/22/2003

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
01/20/2003	01/20/2003	329000581-00	12205-9041	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
3,000.00	DYED DIESEL	DYED DIESEL FUEL HIGH SULFUR FUEL, NONTAXABLE USE ONLY, PENALTY R VEHICLE USE	GL FOR	J,000.00 AXABLE USE	1.0300	3,090.00
		#N/ 	\$3.50 \$4.50		SUETOTAL	3,090.00
,					TOTAL TAX	290.85
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BILLING LOCA	7101		THE STATE OF THE S	Programme of the control of the cont		\$1,29U.85

LAKE CHARLES (337) 436-3674 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer No:

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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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Ship To No:

LEEVAC INDUSTRIES, LLC

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JENNINGS

INVOICE COMMENTS

329002124-00

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

Invoice Number:

Invoice Date:

03/20/2003

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
03/19/2003	03/17/2003	331288	130559043	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
4.00	1507555	SHELL OMALA 68 400L	LB	1,600.00	. 7600	1,216.00
					SUBTOTAL	1,216.00
					TOTAL TAX	79.04
				No. of the second secon		
				ويعمون والمحتاط المتحاطية والمتعاونة		
				and the second s		
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BILLING LOCA			<u> </u>			\$1,295.04

BILLING LOCATION

LAKE CHARLES (337) 436-3674 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to:

L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer No	:
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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

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Ship To No:
LEEVAC INDUSTRIES, LLC

JENNINGS

INVOICE COMMENTS

Invoice Date:

329005559-00

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

Invoice Number:

07/23/2003

SHIP DATE ORDER DATE TICKET NO. **CUSTOMER ORDER NUMBER TERMS** 142549043 NET30 07/21/2003 07/17/2003 336390

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
2,600.00	1 DYED DIESEL	DYED DIESEL FUEL HIGH SULFUR FUEL, NONTAXABLE USE ONLY, PENALT R VEHICLE USE	GL FOR	2,600.00 TAXABLE USE	.9800	2,548.00
			 ?		SUBTOTAL	2,548.0
				The state of the s	TOTAL TAX	152.8
	,		Marie Car			

BILLING LOCATION

LAKE CHARLES (337) 436-3674 PAGE:

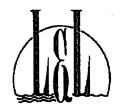
Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Customer No:

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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

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Ship To No:
LEEVAC INDUSTRIES, LLC

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LAKE CHARLES

INVOICE COMMENTS

329007829-00

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

Invoice Number:

Invoice Date:

10/14/2003

ORDER DATE **SHIP DATE** TICKET NO. **CUSTOMER ORDER NUMBER TERMS** 15352453 NET30 10/10/2003 334728 10/10/2003

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
2.00	150475	SHELL DONAX TO OIL 30 5G	PAIL	2.00	35.8200	/1.64
					SUBTOTAL	71.64
	•		1	aggette var	TOTAL TAX	2.87
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BILLING LOCATION

LAKE CHARLES (337) 436-3674

PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to:

L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer No:	40217	4
LEEVAC INDUSTRIES, P.O. BOX 1190	LLC	
PURCHASE ORDER REQ	' D	
TENNINGS	1.4	705

Ship To No:			
JENNINGS	LA	•	

INVOICE COMMENTS

Invoice Number:

329008136-00

Invoice Date:

10/29/2003

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
10/27/2003	10/22/2003	325609	15459-453	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
2.00	1203455	MOBIL DTE 13 M MD	GL	110.00	5.7600	633.60
					SUBTOTAL	633.60
				And the second s	TOTAL TAX	53.8 5
BILLING LOCA	TION		<u> </u>			\$687.45

BILLING LOCATION

LAKE CHARLES (337) 436-3674 PAGE: 1

Total Invoice Amount:

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Sales are subject to terms and conditions on reverse.

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Remit to: L&L OIL AND GAS SERVICES, LLC

P.O. Box 201617 • Dallas, TX 75320-1617 **Customer No:**

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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INVOICE COMMENTS.

Invoice Number:

329008944-00

Invoice Date:

11/30/2003

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	 CUSTOMER ORDER NUMBER	TERMS
11/24/2003	11/21/2003	336866	15683-9044	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
4,000.00		DYED DIESEL FUEL HIGH SULFUR FUEL, NONTAXABLE USE ONLY, PENALTY R VEHICLE USE	GL FOR	4,000.00 TAXABLE USE	.9900	3,960.00
4,000.00	11	LOUISIANA FUEL INSPECTION FEE O 1 1/2" CAMLOCK)	EA	4,000.00	.0012	5.00
					SUBTOTAL	3,965.00
			년 철 사	м	TOTAL TAX	336.60
			4 18 14 81	s.		
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				Pro Pro Colonia		
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LAKE CHARLES (337) 436-3674 PAGE:

Total Invoice Amount:

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Sales are subject to terms and conditions on reverse.

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	Customer	No:
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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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INVOICE COMMENTS

Ship To No:
LEEVAC INDUSTRIES, LLC

JENNINGS

Invoice Number:

Invoice Date:

329017153-00

10/08/2004

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

			 <u> </u>	
SHIP DATE	ORDER DATE	TICKET NO.	 CUSTOMER ORDER NUMBER	TERMS
10/06/2004	09/28/2004	375844	185449060	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
2.00	1507555		E LE	800.00	.8900	712.00
		1			SUBTOTAL	712.00
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ILLING LOCA	TION	PAGE: 1		Total Invoice	Amount:	\$774.30

LAKE CHARLES (337) 436-3674

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to:

L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Cu	sto	mei	<u>· No:</u>

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

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INVOICE COMMENTS

DOCKSIDE

JENNINGS

Invoice Number:

329020663-00

Invoice Date:

01/26/2005

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET	NO.	CUSTOMER ORDER NUMBER	TERMS
01/24/2005	01/20/2005	329020663-0	0	18484-9060	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT	DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
6,800.00	12149	MOBIL MOBILITY	ERM 603 BULK	GE .	4,800.00		
		}				Subtotal	31,348.00
					The state of the s	TOTAL TAX	2,664.58
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BILLING LOCA	TION	PAGE			Total Invaio		\$34,012.58

LAKE CHARLES (337) 436-3674 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to:

L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Cust	ome	<u>r No:</u>

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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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Ship To No: LEEVAC INDUSTRIES,	LLC			
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INVOICE COMMENTS

Invoice Number:

Invoice Date:

329020751-00

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01/28/2005

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

		-		
SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
01/25/2005	01/25/2005	353001	197199060	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION MOBIL MOBILTHERM 603 MD	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
5.00	1214955	MOBIL MOBILTHERM 603 MD	GL	275.00	6.8000	1,870.00
					SUBTOTAL	1,870.00
		Ý			TOTAL TAX	121.55
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	•		* 470 × 1	144 W 8 27		
BILLING LOCA			<u> </u>			\$1,991.55

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LAKE CHARLES (337) 436-3674 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to:

L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer	No:

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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AC INDUSTRIES, LLC

JENNINGS

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INVOICE COMMENTS

Invoice Number:

329025414-00

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

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Invoice Date:

06/30/2005

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
06/30/2005	06/28/2005	329025414-00	20826-9065	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
3.00	151165	SHELL TELLUS 32 5G	PAIL	3.00	32.7000	98.10
					SUBTOTAL	98.10
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LAKE CHARLES (337) 436-3674 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.



Remit to:

L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

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Ship To No:
LEEVAC INDUSTRIES, LLC

JENNINGS

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INVOICE COMMENTS

329025414-00

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

Invoice Number:

Invoice Date:

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06/30/2005

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
06/30/2005	06/28/2005	329025414-00	20826-9065	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
3.00	151165	SHELL TELLUS 32 5G	PAIL	3.00	32.7000	98.1
					SUBTOTAL	98.3
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BILLING LOCATION

LAKE CHARLES (337) 436-3674 PAGE: 1

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.



Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer No: LEEVAC INDUSTRIES, P.O. BOX 1190 PURCHASE ORDER REO		74	
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Invoice Number:

329025512-00

Invoice Date:

07/06/2005

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
07/01/2005	06/30/2005	387170	20847~9065	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
3.00	151165	SHELL TELLUS 32 5G	PAIL	3.00	32.7000	98.10
			1		SUBTOTAL	99.10
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N I INC LOCA		<u> </u>				\$98.10

BILLING LOCATION

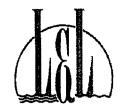
LAKE CHARLES (337) 436-3674 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to:

L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

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LEEVAC INDUSTRIES, LLC

P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

LA 70546

Ship	To No:		
	LEEVAC	INDUSTRIES,	rrc

JENNINGS

LA 70546

INVOICE COMMENTS

Invoice Number:

329027149-00

Invoice Date:

09/08/2005

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

 SHIP DATE
 ORDER DATE
 TICKET NO.
 CUSTOMER ORDER NUMBER
 TERMS

 09/01/2005
 08/26/2005
 329027149-00
 21170-9065
 NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
3.00 1.00	1202655 1507555	MOBIL DELVAC 1300 S 15W40 MD SHELL OMALA 68 400Li	GL LB	165.00 400.00	7.1400 1.0400	1,178.10 416.00
					SUBTOTAL	1,594.10
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LAKE CHARLES (337) 436-3674 PAGE: 1

Total Invoice Amount:

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Sales are subject to terms and conditions on reverse.

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L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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Ship To No: LEEVAC INDUSTRIES, LLC

JENNINGS

70546

INVOICE COMMENTS

Invoice Number:

329027407-00

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

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Invoice Date:

09/26/2005

SHIP DATE **ORDER DATE** TICKET NO. **CUSTOMER ORDER NUMBER TERMS** 21049-9065 NET30 09/09/2005 329027407-00 09/19/2005

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
6,800.00	12149	MOBIL MOBILTHERM 603 BULK	GL	6,800.00	5.4600	37,128.00
					SUBTOTAL	37,128.00
		£5.		.	TOTAL TAX	. 0
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						\$37,128.0

LAKE CHARLES (337) 436-3674 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.



Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

<u>Customer No:</u>

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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Ship To No:
LEEVAC INDUSTRIES, LLC

JENNINGS

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INVOICE COMMENTS

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For Invoice Inquiries & Correspondence:

Accounts Receivable P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

Invoice Number:

Invoice Date:

09/26/2005

SHIP DATE ORDER DATE TICKET NO. **CUSTOMER ORDER NUMBER TERMS** NET30 21246-9065 329027696-00 09/15/2005 09/19/2005

QUANTITY SHIPPED	ITEM NO.	PRODUCT DES	ador de la la como	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
4,000.00		DYED DIESEL FUEI FUEL, NONTAXABLE US R VEHICLE USE		GL TY FOR	4,000.00 TAXABLE USE	2.2000	6,800.00
		.,				Subtotal	8,800.00
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LAKE CHARLES (337) 436-3674 PAGE:

Total Invoice Amount:

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Sales are subject to terms and conditions on reverse.

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Cus	tomer	No:

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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

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INVOICE COMMENTS

Ship To No:
LEEVAC INDUSTRIES, LLC

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Invoice Number:

Invoice Date:

329041033-00

09/28/2006

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
09/26/2006	09/25/2006	329041033-00	23741-9095	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION DYED DIESEL FUEL HIGH SULFUR	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
2,700.00		DOI BOOK, MOBILE FACILITY BOOK	., 2" сом	I	2.0200	5,439.00
	V				SUBTOTAL	5,454.00
					TOTAL TAX	.00
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				A Secretary of the second of t	·	
BILLING LOCA	TION					\$5,454.00

LAKE CHARLES (337) 436-3674 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer No:

402174

LEEVAC INDUSTRIES, LLC P.Q. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

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Ship To No: P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

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INVOICE COMMENTS

Invoice Number:

329046936-00

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

03/22/2007

Invoice Date:

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
03/19/2007	03/19/2007	329046936-00	25495-9083	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTI	2.23	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
9,000.00		DYED DIESEL FUEL HIGH SU FUEL, NONTAXABLE USE ONLY, F R VEHICLE USE		GL FOR	9,000.00 AXABLE USE	1.9400	17,460.00
		₩				SUBTOTAL	17,460.00
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BILLING LOCAT	rion	PAGE: 1	And the second s	Territoria	Total Invoice		\$17,460.00

LAKE CHARLES (337) 436-3674

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L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Cus	tomer	· No:

402174 LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REO'D

JENNINGS

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INVOICE COMMENTS

Ship To No: LEEVAC INDUSTRIES, LLC

JENNINGS

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Invoice Number:

329050023-00

For Invoice Inquiries & Correspondence:

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

Accounts Receivable

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07/11/2007

Invoice Date:

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
07/10/2007	07/06/2007	329050023-00	27021-9084	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
8,500.00	DYED DIESEL	DIESEL FUEL, 3, NA1993, PGIII FUEL, NONTAXABLE USE ONLY, PENALT R VEHICLE USE		8,500.00 TAXABLE USE	2.3200	19,720.00
		w.:			SUBTOTAL	19,720.00
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BILLING LOCAT	TION	PAGE: 1	1	Total Invoice	Amount:	\$19,720.00

LAKE CHARLES (337) 436-3674

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Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Custom	<u>er No:</u>	

LEEVAC INDUSTRIES, LLC P.Q. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

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Ship To No: P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

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INVOICE COMMENTS

Invoice Number:

329051437-00

08/30/2007

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

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Invoice Date:

SHIP DATE	ORDER DATE	TICKET NO.	 CUSTOMER ORDER NUMBER	TERMS
08/28/2007	08/27/2007	329051437-00	27342-9084	NET30

7,600.00 1 DY: NO:	VED DIESEL F OT FOR MOTOR	DIESEL FUEL, UEL, NONTAXABLI VEHICLE USE	3, NA1993, PC E USE ONLY, PEN		GL FOR 1	7,600.00 AXABLE USE	2.3400 SUBTOTAL	17,784.00
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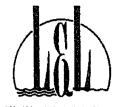
LAKE CHARLES (337) 436-3674 PAGE: 1

Total Invoice Amount:

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Sales are subject to terms and conditions on reverse,

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L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer No:

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LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

Ship To No:

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

INVOICE COMMENTS

Invoice Number:

329051438-00

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

Invoice Date:

08/30/2007

SHIP DATE ORDER DATE TICKET NO. **CUSTOMER ORDER NUMBER TERMS** 08/27/2007 08/28/2007 329051438-00 27342-9064 NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
2,200.00		DIESEL FUEL, 3, NA1993, PGIII FUEL, NONTAXABLE USE ONLY, PENALTY R VEHICLE USE	GL FOR	2,200.00 TAXABLE USE	2.3400	5,148.00
		,			SUBTOTAL	5,148.00
			A THE STATE OF THE	entrant of the second of the s	TOTAL TAX	. 00
BILLING LOCA	TION	PAGE: 1	L	Total Invoice	Amount:	\$5,148.00

LAKE CHARLES (337) 436-3674

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Sales are subject to terms and conditions on reverse.

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Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer No:

402174

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

Ship To No: LEEVAC INDUSTRIES, WHISE	rrc	_	_
JENNINGS	LA	70546	

INVOICE COMMENTS

Invoice Number:

329051463-00

Invoice Date:

08/30/2007

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	 CUSTOMER ORDER NUMBER	TERMS
08/29/2007	08/28/2007	329051463-00	27614-9097	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION		UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
14.00 6.00 18.00	1258655 1507555 1507855	MOBIL DELVAC MX 15W-40 MD SHELL OMALA 68 40	OLE		770.00 2,400.00 7,200.00	8.3300 1.1800 1.1800	6,414.10 2,832.00 8,496.00
		\$H				SUBTOTAL	17,742.10
					The state of the s	TOTAL TAX	.00
BILLING LOCA	rion		igsplace				\$17,742.10

LAKE CHARLES (337) 436-3674 PAGE: 1

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer No:	40217	4	
LEEVAC INDUSTRIES,	LLC		
P.O. BOX 1190			
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Ship To	D No: EEVAC INDUSTRIES,	LLC			
JI	ENNINGS	LA	70546		

Invoice Number:

Invoice Date:

329057430-00

04/03/2008

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	:	CUSTOMER ORDER NUMBER	TERMS
04/02/2008	04/02/2008	329057430-00		32259-9100	NET30

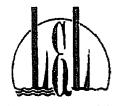
	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
3,000.00	PUMP OVER WA DYED DIESEL	DIESEL FUEL, 3, NA1993, PGIIT TER TO BOAT FUEL, NONTAXABLE USE ONLY, PENALTY R VEHICLE USE	GL FOR	3,000.00 TAXABLE USE	3.2500	9, 750.00
		<u>\$</u>	i Vi		SUBTOTAL	9,750.00
				The state of the s	TOTAL TAX	. 00
BILLING LOCA		TABLE PERMENTANTAL TABLE		Section of the sectio		\$9,750.00

LAKE CHARLES (337) 436-3674

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Sales are subject to terms and conditions on reverse.

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Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer No:

402174

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REO'D

JENNINGS

LA 70546

	Ship	To	N	D	:
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LEEVAC INDUSTRIES, LLC

111 BUNGE ST

JENNINGS

70546

INVOICE COMMENTS

Invoice Number:

329060078-00

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

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Invoice Date:

07/14/2008

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
07/11/2008	07/10/2008	329060078-00	33582-453	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
6.00	1212010T	MOBIL MOBILGREASE XHP222 10T	10PK	6.00	26.9500	161.70
					SUBTOTAL	161.70
					TOTAL TAX	.00
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		Action of the second of the se	1000 1000 1000 1000 1000	And the second s		
ILLING LOCA	TION	PAGE: 1		Total Invoice		\$161.70

LAKE CHARLES (337) 436-3674 PAGE:

Total Invoice Amount: see taking me emeses

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer No: 402174 LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

Ship To No:
LEEVAC INDUSTRIES, LLC JENNINGS

INVOICE COMMENTS

Invoice Number:

Invoice Date:

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<u>0</u>

329064285-00

01/22/2009

For Invoice Inquiries & Correspondence:

Accounts Receivable P.O. Box 6984 • Metairie, LA 70009-6984

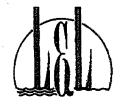
Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	 TERMS
01/05/2009	12/30/2008	329064285-00	5433-9104	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
19,400.00	DYED DIESEL NOT FOR MOTO	Diesel Fuel, 3, Na1993, PGII: Fuel, Nontaxable USE ONLY, PENAL R VEHICLE USE		19,400.00 AXABLE USE	1.7300	33,562.00
					SUBTOTAL	33,562.00
				The same of the sa	TOTAL TAX	. 00
				Service of the servic		
ILLING LOCA	TION	PAGE: 1		Total Invoice	Amount.	\$33,562.00

LAKE CHARLES (337) 436-3674

To assure proper handling, please state the invoice number on all payments.



Remit to: L&L OIL AND GAS SERVICES, LLC

P.O. Box 201617 • Dallas, TX 75320-1617 Customer No: 402174

LEEVAC INDUSTRIES, LLC P.O. BOX 1190 PURCHASE ORDER REQ'D

JENNINGS

70546

Ship To	No: EVAC INDUSTRIES,	LLC		
JI	envings	LA		

INVOICE COMMENTS

Invoice Number:

Invoice Date:

329087474-00

09/19/2011

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
09/16/2011	09/06/2011	329087474-00	43563-354	NET30

7,000.00 1 DIESEL FUEL, 3, NA1993, PGIII GL 7,000.00 3.3800 23,660. DYED DIESEL FUEL, NONTAXABLE USE ONLY, PENALTY FOR TAXABLE USE NOT FOR MOTOR VEHICLE USE SUBTOTAL 23,660.	QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	им	QUANTITY	UNIT PRICE	EXTENDED PRICE
TOTAL TAX	7,000.00	DYED DIESEL	DIESEL FUEL, 3, NA1993, PGIII FUEL,NONTAXABLE USE ONLY,PENALT	GL Y FOR		3.3800	23,660.00
						SUBTOTAL	23,660.00
				t galance and		TOTAL TAX	. 00

BILLING LOCATION

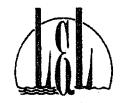
LAKE CHARLES (337) 436-3674 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to: L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer No:	40217	4
LEEVAC INDUSTRIES P.O. BOX 1190 PURCHASE ORDER RE		
jenni ngs	LA	70546

Ship To No: LEEVAC INDUSTRIES,	trc			
JENNINGS	LA	•		

INVOICE COMMENTS

Invoice Number:

329087611-00

For Invoice Inquiries & Correspondence:

Invoice Date:

09/19/2011

Accounts Receivable P.O. Box 6984 • Metairie, LA 70009-6984 Phone: (866) 391-5971

SHIP DATE	ORDER DATE	TICKET NO.	CUSTOMER ORDER NUMBER	TERMS
09/16/2011	09/12/2011	329087611-00	43563-354	NET30

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
3,000.00	DYED DIESEL	DIESEL FUEL, 3, NA1993, PGIII FUEL, NONTAXABLE USE ONLY, PENALT R VEHICLE USE	GL FOR	3,000.00 AXABLE USE	3.3800	10,140.00
		÷			SUBTOTAL	10,140.00
			では、		TOTAL TAX	.00
	,		American Americ	The second secon		

LAKE CHARLES (337) 436-3674 PAGE: 1

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Remit to:

L&L OIL AND GAS SERVICES, LLC P.O. Box 201617 • Dallas, TX 75320-1617

Customer No:	40217		
LEEVAC INDUSTRIES,	LLC		
P.O. BOX 1190			
PURCHASE ORDER REQ	ď.		

JENNINGS

70546

Ship To No: LEEVAC INDUSTRIES, LLC 111 BUNGE ROAD (HWY 90 E) ATTN: LORI VIA SAIA MOTOR FREIGHT

JENNINGS

T.A 70546

INVOICE COMMENTS

Invoice Number:

Invoice Date:

331020629-00

11/29/2006

For Invoice Inquiries & Correspondence:

Accounts Receivable

P.O. Box 6984 • Metairie, LA 70009-6984

Phone: (866) 391-5971

SHIP DATE ORDER DATE TICKET NO. **CUSTOMER ORDER NUMBER TERMS** NET30 11/28/2006 11/27/2006 371057 24344-9090

QUANTITY SHIPPED	ITEM NO.	PRODUCT DESCRIPTION	UM	PRICE QUANTITY	UNIT PRICE	EXTENDED PRICE
4.00	150755	SHELL OMALA 68 35#	PAIL	4.00	57.7900	231.16
	•				SUBTOTAL	231.16
				·	TOTAL TAX	.00
				And the second of the second o		
RII I ING I OCA						\$231.10

BILLING LOCATION

MORGAN CITY (985) 384-1618 PAGE:

Total Invoice Amount:

To assure proper handling, please state the invoice number on all payments.

Sales are subject to terms and conditions on reverse.

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Select the

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1 OF 1

TIFFANI WADE 903-983-6270 MARTIN GAS SALES INC. 4200 STONE RD KILGORE TX 75662

SHIP TO:

MR. KENNETH TALTON U.S. EPA, REGION 6 1445 ROSS AVE

DALLAS TX 75202-2711

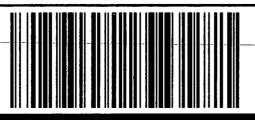


TX 752 9-33



NEXT DAY AIR

TRACKING #: 1Z 715 817 01 9499 6754



GS 17.5.27.

BILLING: P/P

Reference 1: MTI Corporate

WNTNV50 66.0A 07/2015



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Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip **GETTING YOUR SHIPMENT TO UPS** Fold the printed label at the solid line below. select Print from the File menu to print the label Print button on the print dialog box that appears. Note: If your browser does not support this function Ensure there are no other shipping or tracking labels attached to your package. Take your package to any location of The UPS StoreÅ®, UPS Access Point(TM) location, UPS Drop Your driver will pickup your shipment(s) as usual **Customers with a Daily Pickup** not have a pouch, affix the folded label using clear plastic shipping Place the label in a UPS Shipping Pouch. If you do tape over the entire labe



P. O. Box 191 - Kilgore, Texas 75663-0191

Ath. MR. Kenneth Talton